

# Privacy Policy

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# Introduction

United Energy Distribution Pty Limited (ABN 70 064 651 029) and each of its related bodies corporate operating under the "United Energy" brand (together **United Energy, us, we** or **our**) views the protection of the privacy of individuals (**you** or **your**) as an integral part of its commitment to deliver affordable, reliable and safe electricity supply, empower customer choices and deliver services important to our communities and environment. This document outlines our policies relating to the management of personal information as required by the *Privacy Act 1988* (Cth) (**Privacy Act**).

## What's in this policy?

This Privacy Policy tells you:

- the information United Energy might collect about you
- how we might use that information
- when we might use your details to contact you
- what information we might share with others
- the steps we take to keep your personal information secure
- your choices about the personal information you give us
- how you can access or correct the personal information that we hold about you
- our complaints process and how best to contact us.

## What does this policy cover?

This Privacy Policy sets out United Energy's personal information handling practices in compliance with applicable laws that protect your privacy.

This document is made available for the purpose of providing you with an understanding of how United Energy collects, uses and manages the personal information that we receive and collect.

## Relevant legislation

United Energy is bound by the Privacy Act, which contains the Australian Privacy Principles, and the *Health Records Act 2001* (Vic), which contains equivalent principles for health-related information.

In our capacity as an electricity distributor, we are also subject to other laws, regulations and statutory instruments that affect how we may collect, use, keep, secure and disclose your electricity data. The Privacy Act permits us to handle personal information in a way which is authorised or required by any other law, or an order of an Australian court/tribunal.

We are committed to complying with our legal obligations.

## To whom does the policy apply?

The policy has been adopted by United Energy and applies to all people working within the organisation. This includes our employees, contracted service providers and those on work experience.

## When will the policy be reviewed?

This policy will be reviewed biennially, or following legislative change, whichever comes sooner.

Any changes to this policy will be published on our website. You may obtain a copy of our current policy or contact our Privacy Officer via the details below.

## About United Energy

United Energy supplies electricity to Victorians in Melbourne's east and south-east suburbs and the Mornington Peninsula. We do this by taking the power from high voltage transmission lines, converting it into a lower voltage, and then distributing it via our network of poles and wires to your home or business.

Our role is to make sure power is safely and reliably delivered to your electricity meter.

Our key functions include:

- maintaining network safety and reliability to meet the current power supply needs of our customers
- extending and upgrading the network so that the future power supply needs of customers are met when required
- operating the network 24×7
- connecting new customers to the network
- maintaining the public lighting system
- reading electricity meters
- providing meter data to retailers and
- enabling emerging services such as distributed energy resources.

More information about United Energy can be found [here](#).

## What is 'personal information'?

Personal information includes a broad range of information, or an opinion, that could identify or reasonably identify an individual. What amounts to personal information will vary, depending on the circumstances.

For example, personal information that may be handled by United Energy includes:

- an individual's name, signature, address, and contact information
- employee record information
- photographs
- internet protocol (IP) addresses
- sensitive information, including voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique)
- location information from a mobile device (because it can reveal activity patterns and habits) and

- in some cases, energy usage data (because it can reveal household movements and habits).

More information about the types of personal information that United Energy handles is set out below.

## How we collect personal information

United Energy collects personal information that is reasonably necessary for carrying out our functions or activities, or where the collection is otherwise permitted under the Privacy Act or other laws to which we are subject.

It is our preference to collect personal information directly from you unless it is unreasonable or impracticable to do so. We typically collect information directly from individuals via smart meters, or when customers contact us directly via our contact centres, our websites and online platforms, and social media platforms.

Due to the nature of our business, it can be impracticable for us to collect personal information directly from individuals. We often receive personal information about customers indirectly from energy retailers, who sell energy services directly to those customers, and from electrical contractors.

### Customers

#### *Information we receive about you*

We receive personal information about customers connected to our distribution network from their electricity retailer, registered electrical contractor or other relevant party. This information is collected for the purposes of delivering electricity services to our customers, and contacting customers in relation to their electricity supply. If this personal information is not provided, we will be unable to provide certain electricity services to those customers.

When a customer requests a service from us via their electricity retailer, registered electrical contractor or other relevant party, we collect some or all the following types of personal information:

- your name, telephone number and email address
- your postal address
- the address at which our service is provided, and its National Metering Identifier (**NMI**). A NMI is a unique number for the electricity connection at your address
- the types of products and services that have been requested and
- any other information reasonably necessary for us to provide our products and services to you.

### Life Support Status

Where customers require specific life support machines in their homes (such as a dialysis machine or oxygen concentrator), we work with your electricity retailer to provide special supply arrangements.

To do so, we collect or receive notification that a supply address requires special electricity arrangements (known as life support status). A life support status is collected directly from the

customer by third parties, such as their electricity retailer or health authorities, and shared with United Energy with customer consent.

### ***Information that we collect directly from you***

In addition to the above, United Energy also collects information about you through your interactions with us via smart meters, contact centre, our websites and online platforms, and social media. This information may include:

- name and contact details
- details and information in relation to feedback and complaints
- usage information and energy consumption profiles
- information and material regarding a claim for compensation if you think you have suffered loss as a result of our supply of electricity to you
- where payments to United Energy are required, any relevant financial details.

When you call us, your telephone call may be recorded for quality, verification, security and compliance purposes. If you do not wish your call to be recorded, please advise us at the time of your call.

We may also derive new personal information about you, such as insights about your electricity consumption, by aggregating various categories of personal information which we hold about you, including smart meter data.

### **Smart meters**

Under our statutory obligations, we are required to collect meter data concerning the electricity consumption and load profile of customers connected to the United Energy distribution networks through smart meters.

Smart meters provide two-way communication between customers' electricity meters and United Energy (or the customer's appointed data provider). Electricity meter readings are recorded at regular intervals to facilitate more accurate billing, identify faults and issues and assist customers to better manage their energy consumption through greater visibility of usage patterns.

### **myEnergy Portal**

The myEnergy portal is an online application that gives an occupier of premises connected to an electricity meter (the responsible party) within our distribution networks the ability to:

- tell us how you would like to be notified about interruptions to the supply of energy to your premises
- access and review your electricity metering data
- transfer your metering data to the Victorian Government's energy compare website "Victorian Energy Compare"
- log feedback about the service we have provided to you
- lodge a claim for compensation.

We collect personal information, such as your contact information, through the myEnergy portal to process your requests, applications and provide our services.

### **Our websites**

United Energy's websites use Google Analytics, a web analytics service provided by Google Inc. (**Google**). Reports obtained from Google Analytics are used to help improve the efficiency and usability of our websites. Google Analytics use first-party cookies to help analyse how users use our websites. The information generated by the cookie about this (including IP addresses) will be transmitted to and stored by Google on servers around the world.

Google uses this information for the purpose of evaluating the use of our websites, compiling reports on website activity for site operators and providing other services related to website activity and internet usage. Google will not associate user IP addresses with any other data held by Google. You can 'opt out' of the collection of information via Google Analytics by downloading the Google Analytics Opt-Out Browser Add On.

## **Social media**

We use social networking services such as Twitter, Facebook and YouTube, in addition to traditional methods, to connect with our audience. These include responding to customer enquiries and feedback. Any personal information collected from social media sites will be handled in accordance with this policy.

The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies, and we recommend you read these also.

## **Recruitment and employment**

If you apply for a job with us, we will collect some or all the following personal information and health information from you:

- your name and contact details
- the details in your employment application
- a copy of your curriculum vitae and employment history
- evidence of entitlement to work within Australia
- details of any relevant medical conditions
- other personal information relevant to your application (including details of any relevant medical conditions).

If your application is successful and you are employed by us, we may collect additional personal and health information from you when it is necessary for us to do so. For example, we may collect health information about an employee when investigating a health and safety incident, or when an employee discloses their personal or health information in circumstances where their capacity to perform their role is affected.

GPS technology in equipment used by employees performing work on the electricity network may be activated and accessed by us to obtain information about employees' location in the field on Code Red days, Total Fire Ban days and Escalation Events. This information will not be used other than to locate employees for their health and safety, to allocate employees to the most appropriate location on Code Red days, Total Fire Ban days and Escalation Events, and will not be retained.

## **Other individuals**

As part of our operations, we may need to collect personal information from other categories of individuals, such as:

- electrical contractors and licensed electrical workers, from whom we collect information such as name, contact details, employment details and registration/licence number
- solar and/or battery installers, from whom we collect information such as name, contact details, employment details and accreditation details
- individuals who are engaged by our customers, suppliers and other business partners, from whom we collect information such as name, contact details and employment details.

## How we use your personal information

In general, we use your personal information to:

- identify you as our customer
- provide and maintain services to customers
- improve services provided to customers
- provide you with access to your meter data
- verify your identity and validate your requests for access to your meter data (or a request to authorise a third party to access your metering data)
- validate your requests for access to our online customer portal/s
- consider your application for employment
- verify your credentials and qualifications
- comply with our legal and/or contractual obligations where required or authorised by law, which may include emergency situations and assisting law enforcement agencies.

We may also use your personal information for auditing, management, or statistical purposes. This includes using your personal information in an aggregated and de-identified form for research and analysis. On these occasions we will use the data to analyse and examine trends and demographics to help us offer you improved services.

We will not use your personal information other than as set out above unless we have your express consent, or where the law otherwise permits us to do so.

### When we use your details to contact you

In Victoria, the Essential Services Commission requires that we provide you with information in prescribed situations, including:

- offering customers information about who we are and what we do in providing the network of poles and wires that deliver electricity, both as part of the onboarding process for new customers and thereafter on an annual basis
- where a notice of any planned outage (maintenance) that will impact your property, in which case we are required to provide no less than 4 business days' notice.

We will use personal information we hold about you (including your name and contact details) to contact you for these purposes.

We may also contact you to:

- notify you about emergencies, unplanned outages, faults, or interruption to supply of power
- keep you informed about the products, services, and special offers that we can offer that might be relevant to your power consumption, and to seek your opinion on matters

related to your power consumption. These offers may continue after you cease to acquire services from us

- share electricity-related educational or safety awareness campaigns
- where we are permitted to do so by law, promote and market our products and services to you including through telephone and electronic methods such as email, SMS, and websites
- respond to, investigate, or resolve an enquiry or complaint
- discuss your application for employment.

Some of the examples above may constitute direct marketing. If you do not want us to use your personal information for direct marketing activities, please contact us via the details set out at the end of this policy.

### **Information we might share with others**

We may disclose your personal information to:

- in the case of customers, our agents, contractors and service providers who we contract with to provide and improve services to you
- service providers and other third parties that provide products or services to us (including our technology service providers, data analytics service providers and other business or administration service providers)
- electricity retailers and other electricity market participants (such as the Australian Energy Market Operator (**AEMO**)) to ensure they have sufficient information for billing customers
- in the case of potential employees, our psychometric testing service providers, medical providers, employment agency and recruitment suppliers, the Australian Department of Home Affairs and our external recruitment database service provider
- in the case of information from smart meters, to the occupier of the relevant premises, or to a third party at the occupier's request
- at your request, to the Victorian Government for the purpose of the Victorian Energy Compare tool
- our related bodies corporate (including entities not operating as part of the United Energy brand)
- any regulator, government authority or agency who has the right to access our records or request information from us
- any other organisation or person where you have provided us with your consent or we are otherwise legally permitted to do so
- emergency services, law enforcement agencies or government departments in the event we believe there is a serious threat to life or health, in an emergency or where disclosure is required or authorised by law.

### **Transfer of your personal information to other countries**

We may disclose your personal information to our agents, contractors and service providers that reside outside Australia. We may also disclose your personal information to our parent companies that reside in Hong Kong for the purposes of internal audit reviews, business reporting and employee development and exchange opportunities.

In all instances we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient of the personal information protects your personal information and only uses it for purposes set out in this Privacy Policy. If an overseas recipient is not subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least

substantially similar to the way in which the Australian Privacy Principles protect your information, we will take steps such as establishing contractual commitments from the overseas recipient as to the security and protection of your personal information.

## AI and Automated Decision Making

United Energy uses several programs and applications which utilise machine learning and other artificial intelligence (AI)-based processes. AI tools may be used by United Energy for a variety of functions, including to:

- transcribe and analyse calls
- analyse requests and queries raised with us, and allocate them to appropriate parts of our business for resolution
- schedule any truck-based services (such as connection requests)
- verify information provided to us by registered electrical contractors and licensed electrical workers
- process applications for employment submitted to us
- provide general assistance to United Energy staff.

The use of these AI tools involves the processing of some personal information, including names, contact information, addresses, registration/licence numbers, information included in a job application and other information you provide when you contact us. Your personal information may also be used in conjunction with the outputs of these AI tools.

## How we secure your personal information

We take reasonable steps to ensure the security of your personal information.

As far as practicable, we take measures to ensure that the information we collect, use or disclose is accurate, complete, relevant and up to date. We have also implemented technical, administrative and physical security measures that are designed to protect your personal information from misuse, interference, and loss, as well as unauthorised access, modification or disclosure. We routinely test and review the information security measures that we have in place.

United Energy has robust operational safeguards in place to protect personal information and other data related to smart meters.

For example:

- all wireless links are encrypted and cannot be disabled
- access to data from smart meters is restricted, with security measures such as password protection
- varying levels of encryption of data have been incorporated, as well as digital certificates and intruder detection, to make sure that only authorised users can gain access to the meters
- mandatory security processes are in place, such as regular review of audit trails in line with meter data provider accreditation and regular audits undertaken by AEMO
- in home display devices are securely bound to the meter so that information can only flow to that device.

# Your choices about your personal information

## Notification preferences

Through the myEnergy portal, you can tell us how you want us to communicate with you about interruptions to supply. You can change your preferences for how you want us to communicate with you at any time (noting that we will still be required to contact you per the '*When we use your details to contact you*' section outlined above).

## Anonymity

Where possible, we allow individuals to interact with us anonymously or using a pseudonym. For example, customers can report an outage without identifying themselves.

However, it may be impracticable for us to provide a service to individuals who have not identified themselves. As an example, we may be unable to connect new customers to the distribution network without the necessary identifying information.

## Your right to access your personal information

You can request us to provide you with access to the personal information that we hold about you, noting that there are some circumstances in which we are not required to give you access.

There is no fee for making such a request; however, we may charge you an administrative fee for providing this access. We will endeavour to respond to your request within 14 working days. If we cannot give you access to the personal information, we will provide you with the reasons for our decision.

You can request access to the personal information we hold about you by contacting our Privacy Officer using the contact details below.

## Your right to correct your personal information

You have the right to request that United Energy correct the personal information we hold about you. If we correct the personal information, we will take reasonable steps to notify those corrections to any entity to whom we have disclosed the personal information unless it is impracticable or unlawful to do so.

If we do not correct your personal information, we will provide you with the reasons for our decision and take reasonable steps to associate a statement with the personal information believed to be inaccurate.

To request correction of your personal information, please contact our Privacy Officer using the details below.

## Our feedback and complaints process

If you wish to provide feedback, or make a complaint, about the way we have handled your personal information (including any request for access or correction), please contact our Privacy Officer using the contact details noted below.

All complaints will be handled in line with our dispute resolution process.

If, after your discussions with one of our senior officers, you remain dissatisfied you may refer your complaint to the Energy and Water Ombudsman Victoria. You can contact the Ombudsman via their website <https://www.ewov.com.au/> or via telephone on 1800 500 509.

You may also choose to refer your complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner via their website <https://www.oaic.gov.au/> or via telephone on 1300 363 992, or to an independent advisor to understand alternative courses of action which may be available.

## Our contact details

If you require more information about the way we manage personal information that we hold, or wish to request access to, or correction of, your personal information, please contact our Privacy Officer via:

**Mail:** United Energy, PO Box 449, Mount Waverley, VIC 3149

**Telephone:** For matters concerning the United Energy Network, 13 20 99

**E-mail:** [privacy@ue.com.au](mailto:privacy@ue.com.au)

## Document control

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Warning: hard copies of this document may not be the latest version. The most up-to-date document is located on the United Energy website.