



Privacy Policy

Contents

Introduction	3
What's in this policy?.....	3
What does the policy cover?	3
Relevant legislation	3
Relationship of the Privacy Act to other laws.....	3
To whom does the policy apply?.....	3
When will the policy be reviewed?	4
About United Energy	4
Definitions.....	4
What is 'personal information'?	4
What is 'sensitive information'?.....	4
What are the Australian Privacy Principles (APPs)?.....	5
What are the Victorian Health Privacy Principles (HPPs)?	5
How we collect personal information	5
Customers	5
Information we receive about you	5
Information that we collect from you	6
Recruitment and employment	7
How we use your personal information.....	7
When we use your details to contact you	8
Information we might share with others	8
Transfer of your personal information to other countries	9
How we secure your personal information.....	9
Your choices about your personal information.....	9
Notification preferences	9
Anonymity.....	10
Your right to access your personal information.....	10
Your right to correct your personal information.....	10
Our feedback and complaints process.....	11
Our contact details	11

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023
Issue No:	5		Page 2 of 11

Introduction

United Energy views the protection of an individual's privacy as an integral part of its commitment to deliver affordable, reliable and safe electricity supply, empowering customer choices and delivering 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 the policy cover?

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

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

Relevant legislation

United Energy is bound by the *Privacy Act 1988* (Cth), which contains the Australian Privacy Principles and the *Health Records Act 2001* (Vic) which contains very similar principles for health-related information.

In addition, we are also bound by the National Electricity Rules and various determinations made by the Australian Energy Market Operator in relation to how we may collect, use, keep, secure and disclose your electricity data.

We are committed to complying with our legal obligations.

Relationship of the Privacy Act to other laws

If a provision made by or under the Privacy Act is inconsistent with a provision made by or under any other Act, that provision in the other Act prevails to the extent of the inconsistency.

To whom does the policy apply?

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

This Privacy Policy also covers each of United Energy's related bodies corporate.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer	
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023	Page 3 of 11
Issue No:	5			

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 on the details below.

About United Energy

United Energy supply 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, convert them into a lower voltage, and then distribute 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 24x7.
- connecting new customers to the network.
- maintaining the public lighting system.
- reading electricity meters.
- providing meter data to retailers.
- enabling emerging services such as distributed energy resources.

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

Definitions

What is 'personal information'?

Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

For example, personal information may include:

- an individual's name, signature, address, phone number or date of birth.
- sensitive information.
- employee record information.
- photographs.
- internet protocol (IP) addresses.
- 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 user activity patterns and habits).

What is 'sensitive information'?

Sensitive information is personal information that includes information or an opinion about an individual's:

- racial or ethnic origin.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023
Issue No:	5		Page 4 of 11

- political opinions or associations.
- religious or philosophical beliefs.
- trade union membership or associations.
- sexual orientation or practices.
- criminal record.
- health or genetic information.
- some aspects of biometric information.

Generally, sensitive information has a higher level of privacy protection than other personal information.

What are the Australian Privacy Principles (APPs)?

The Australian Privacy Principles (APPs) are a set of 13 principles that regulate how personal information is handled. These principles underpin the Privacy Act.

What are the Victorian Health Privacy Principles (HPPs)?

These are legal obligations which organisations, defined to include Victorian public sector agencies and private sector organisations, must abide by when they collect, hold, use and disclose a person's health information. These principles underpin the Health Records Act.

How we collect personal information

United Energy only collects personal information that is necessary for carrying out our functions or activities. It is our preference to collect this information directly from you unless it is unreasonable or impracticable to do so.

However, due to the nature of the business, it is often impracticable for us to collect personal information directly from individuals and we generally receive personal information about customers indirectly from energy retailers, who sell energy services directly to those customers.

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.

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 to deliver electricity services to those customers and contact our 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 the customer's electricity retailer, registered electrical contractor or other relevant party, we collect some or all of 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.
- Any other information reasonably necessary for us to provide our products and services to you.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023
Issue No:	5		Page 5 of 11

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 customers' consent.

Information that we collect 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.

Smart meters

In accordance with the [National Electricity Rules](#) we 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 their appointed data provider). Electricity meter readings are recorded at regular intervals and assist customers to better manage their energy consumption through greater visibility of usage patterns.

Information from smart meters may be disclosed to the occupier of the relevant premises or to a third party at the occupier's request. United Energy may need to disclose your personal information to retailers and other market participants, such as AEMO.

myEnergy Portal

The myEnergy Portal is an online application that gives the 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".
- Lodge 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 Portal to process your request, application or provide our services.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer	
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023	
Issue No:	5			Page 6 of 11

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 and used 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 Curriculum vitae and your employment history.
- Evidence of entitlement to work within Australia.
- Details of any relevant medical conditions.
- Other personal information relevant to your application.

If your application is successful and you are employed by us, we may collect additional personal information and health information from you where 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, when applying the Alcohol and Drug Policy or when a person discloses to us 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.

How we use your personal information

In general, we use your personal information to:

- Identify you as our customer.
- Provide and maintain services to our customers.
- Improve services provided to our customers.
- Provide you with access to your meter data.
- Verify your identity and validate your requests for access to your meter data (or a

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023
Issue No:	5		Page 7 of 11

- request to authorise a third party to access your metering data).
- Validate your requests for access to our online customer portal/s.
- Comply with our legal obligations and/or 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. 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 unless:

- You would reasonably expect us to use the personal information for that other purpose.
- There are reasonable grounds to believe that disclosure is necessary to prevent a threat to life or health.
- We suspect that unlawful activity is or has been engaged in and we will use the personal information or data to investigate the suspected unlawful activity.
- The use is authorised by law or reasonably necessary to enforce the law. These uses may include where we are required to provide information in response to subpoenas or warrants or other legal processes.

When we use your details to contact you

In Victoria, the Essential Services Commission regulates that we provide you with information in the following situations:

- An unplanned outage (fault) within 5 minutes of us becoming aware of a fault affecting your property.
- A planned outage (maintenance) with no less than 4 business days' notice.
- Annually send a communication to let you know who we are and what we do.

We may also contact you to:

- Notify you about emergencies, 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. These offers may continue after you cease to acquire services from us.
- Share electricity-related educational or safety awareness campaigns.
- Unless you have asked us not to, we may use your personal information to 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.
- Consider applications for employment.

If you would not like 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, and contractors who we contract with to provide and improve services to you.
- 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 Immigration and citizenship and our external recruitment database service provider.
- Our related bodies corporate.
- Any regulator, government authority or agency who has the right to access our records.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer	
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023	
Issue No:	5			Page 8 of 11

- Any other organisation or person where you have provided us with your consent.
- 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 and contractors 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.

How we secure your personal information

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

United Energy has robust operational safeguards in place to ensure that any personal information in the context of smart meters is dealt with in accordance with the Australian Privacy Principles.

For example:

- All wireless links are encrypted and cannot be disabled.
- Access to data from smart meters will be 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

In Victoria, the Essential Services Commission regulates that we provide you with information in the following situations:

- Contact new customers to let you know who we are and what we do in providing the network of poles and wires that deliver electricity.
- An unplanned outage (fault) within 5 minutes of us becoming aware of a fault affecting your property.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer	
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023	
Issue No:	5			Page 9 of 11

- A planned outage (maintenance) with no less than 4 business days' notice.
- Annually send a communication to remind you about who we are and our role in distributing electricity to your property.

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 occasions 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. We will comply with any request to access the personal information held to the extent required by law.

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 you have provided 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.

Exceptions to the requirement for us to provide you with access to your personal information include:

- Where providing access will pose a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual.
- Where the information relates to existing legal proceedings between us and you and the information would not be discoverable in the process of those legal proceedings.
- Where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of laws, or denying access is specifically authorised by law.

If we do not allow you to 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 correct the personal information you have provided to us, please contact our Privacy Officer using the details below.

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023
Issue No:	5		Page 10 of 11

Our feedback and complaints process

If you wish to provide feedback, or make a complaint, about the way we have handled your personal information, please contact our Privacy Officer using the contact details noted below.

All complaints will be handled in line with our dispute resolution process available [here](#).

If after your discussions with one of our senior officers, you remain dissatisfied you may refer your complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner via their website www.oaic.gov.au or via telephone on 1300 363 992.

You may also choose to refer your complaint to the Energy and Water Ombudsman Victoria, as outlined in our Customer Charter. You can access our Customer Charter via our website or via this link. You can contact the Ombudsman via their website www.ewov.com.au or via telephone on 1800 500 509.

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

Administrator:	Data Privacy Lead	Document Owner:	Privacy Officer
Document No:	UE-PO Privacy Policy	Revised On:	21/12/2023
Issue No:	5		Page 11 of 11