

Privacy Policy

Effective:	From 12 March 2014	Document:	CE-MK-B-014
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1 Purpose

ConnectEast Pty Ltd (**we** or **us**) respects the privacy of our customers and other individuals (**you**) about whom we collect personal information and credit information in the course of our business. This policy sets out how we manage your information. This policy is dated 12 March 2014.

2 What personal information do we collect

Personal information is information or an opinion about you.

The personal information we collect about you may include your name, date of birth, address, telephone number, email address, driver licence number, vehicle details, and your EastLink PIN, username or password, bank account and credit card details, credit history and toll road travel history.

If you choose not to give certain personal information to us, we may not be able to provide you with the services or the level of service you require.

Occasionally, you may need to give us personal information about other individuals such as family members or other individuals authorised to act on your behalf. Please tell those individuals that you are giving us their personal information and direct them to a copy of this policy.

We do not collect sensitive personal information (such as information about anyone's health, racial or ethnic origin, political opinions, religious beliefs or affiliations or trade union membership) except with the person's consent.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you inquire about our products and services you do not need to provide your personal details.

3 How we collect your personal information

We collect most personal information directly from you - for example, when you provide information to us by phone, email, in an application for one of our products or through our websites or when you use EastLink.

We may also collect personal information about you from third parties. For example, we may collect personal information from:

- public sources, such as telephone directories, the electoral roll or other websites

- credit reporting bodies, if we ask for a report about your credit history
- other Australian toll road operators, who provide us with information about travel on their toll road by our accountholders
- government vehicle registration authorities, who provide us with person information about motorists who travel on EastLink without a tolling product
- marketing companies, if we acquire contact information to tell you about EastLink and our products that may interest you
- our agents and payment channels, who may sell our products to you or collect payments from you
- your authorised representatives.

We may also collect information when you use EastLink through safety and traffic management cameras, incident detection systems, vehicle registration detection systems, electronic toll collection systems and the tag attached to your vehicle.

Our websites

Our websites may use “cookies” to track your website usage, to remember your preferences and for other site administration purposes. You may be able to disable cookies through your internet browser. However, if you do so, you may not be able to access certain areas of our websites or enjoy the improved website experience that cookies offer.

Our websites may also detect and use your internet protocol (IP) address or domain name for site administration purposes. No personal information is collected. Rather, the tracking of usage patterns of visitors to our websites helps us to monitor and improve the content and performance of our websites.

Our websites may contain links to other websites managed by other organisations. We are not responsible for the content or privacy practices of other websites, nor liable for the use of other websites. You should any privacy policy and terms of use of any other website before using it.

4 How we use your personal information

We generally use and disclose personal information to provide our services and operate EastLink, to recover tolls and fees payable for use of EastLink, or as otherwise required or authorised by law. This may include use of personal information to carry our market research or analysis to assist us in improving our services and the operation of EastLink. Personal information may also be used to maintain, develop and test our business systems.

We also use personal information to provide you with information relating to EastLink, our products and services and related special offers from our business partners. We provide you with an option to unsubscribe from this service.

We disclose certain personal information to other Australian toll road operators to facilitate travel by our accountholders on other Australian toll roads with which we have roaming arrangements and to allow the operators of those roads to obtain payment for travel.

If you do not wish to receive any marketing material from us or our marketing partners, please tell us. Where you receive electronic marketing material from us, you will be given the option of “unsubscribing” if you do not wish to receive such marketing material from us in the future.

Providing your personal information to others

For the purposes described in this policy, we may disclose personal information:

- subject to any restrictions imposed by any relevant legislation, among ConnectEast's related entities
- under information sharing arrangements with the operators of other Australian toll-roads
- to our suppliers, service providers, professional advisers and agents, including:
 - mailhouse organisations;
 - contractors that provide payment channel services for our products, accounts and invoices
 - towing, roadside support and maintenance and logistics contractors
 - debt collection companies and credit reporting bodies
 - information technology suppliers that provide support, maintenance and upgrade services for our systems
- to direct marketing contractors
- to government agencies and any entity responsible for the collection of tolls or the taking of enforcement action concerning use of EastLink
- to anyone to whom any part of our assets or business is transferred
- where an individual to whom the personal information relates has otherwise consented
- as required by relevant laws and regulations (such as in response to a subpoena, warrant or request from a government law enforcement agency or under laws and regulations relating to the operation of EastLink).

We may disclose information to research institutions and traffic management authorities (among others) for statistical or research purposes, but will only do so once the information has been de-identified and de-linked from any personal information.

Information disclosed to overseas organisations

We may need to disclose your personal information to organisations located overseas. These organisations are service providers that may perform a range of technology, operational and customer service functions for us. They may be located in South-East Asia, the USA and Europe.

When we disclose information overseas, we take commercially reasonable steps to ensure your information is treated in accordance with the standards that apply in Australia.

5 How we manage your credit information

Credit information is information relating primarily to your credit-related dealings with us.

The credit information we collect about you may include your personal information, account history, and other information about payments and defaults in the normal course of our business operations.

How we collect credit information

We collect most of this information from you, including through our records of your account activity. We may also collect credit information about you from third parties. For example, we may collect credit information from:

- public sources, such as government registers and other websites
- credit reporting bodies, if we ask for a report or access to information about your credit history to help in our assessment of your application for an account with us and ongoing management of your account
- debt collection companies, if we ask for their assistance in recovering amounts owed by you.

Providing your credit information to others

For the purposes described in this policy, we may disclose your credit information:

- to credit reporting bodies, which aggregate credit information from credit providers for reports provided to us and other credit providers
- to debt collection companies, if we ask for their assistance in recovering amounts owed by you
- to government agencies and any entity responsible for the collection of tolls or the taking of enforcement action concerning use of EastLink.

We do not report default information to credit reporting bodies.

We do not disclose credit information about you to any organisations located outside Australia.

At the date of this policy, we disclose credit information to the following credit reporting body:

Creditor Watch Pty Ltd, ABN:	80 144 644 244
Mail:	GPO Box 276, Sydney, NSW 2001
Phone:	1300 50 13 12
Website:	www.creditorwatch.com.au

Credit reporting bodies are required to have a policy explaining how they manage your credit information. If you would like to know more, you can contact them directly.

6 Managing your information

Keeping information accurate and up to date

We take all reasonable steps to ensure that the personal and credit information we hold is accurate, complete and up-to-date. However, the accuracy of the information we hold depends on the accuracy of the information provided to us by you and others. Please help us to keep our records up to date by informing us of changes to your name, contact details or other information we hold about you.

Protecting your information

We protect your personal and credit information from misuse, unauthorised access or disclosure and loss.

We maintain a number of physical and electronic measures to protect your information. We restrict access to our electronic databases, maintain firewalls and encrypt certain data where practicable to do so. However, we cannot guarantee the security of information provided via electronic means.

You can help us protect your privacy by observing our security requirements and contacting us if your personal information changes. You should keep your EastLink PIN and passwords confidential and secure from disclosure to other people.

Accessing and correcting your information

We will give you full access to the personal and credit information we hold about you unless there is a legal or administrative reason why this is not possible. For example, we may not give you access if doing so would affect the privacy of another person. If we do not give you access to any part of the personal information we hold about you, we will tell you why.

If you believe any personal or credit information we hold about you is incorrect, you may ask us to correct such information. We will take reasonable steps to ensure the information is corrected. If we refuse to change your personal information we will tell you why.

We will need to take reasonable steps to verify your identity before providing you with access to personal or credit information or responding to a request to correct information. We can provide access to or correct most personal information over the telephone, but we may require you to make your access or correction request in writing in some cases.

7 How to contact us

For further information about ConnectEast's privacy policies or practices or to update your personal information, please visit the EastLink website at www.EastLink.com.au or contact our Customer Relations team. You should also contact our Customer Relations team if you have any concern about the way we have handled your personal or credit information so that we can address your concern as soon as possible.

You can contact our Customer Relations team by mail, phone or email:

ConnectEast Customer Relations

Mail: PO Box 744, Ringwood VIC 3144
Phone: 13 LINK (13 5465)
Email: privacy@connecteast.com.au

External dispute resolution

If you are not satisfied with our resolution of your concern or complaint, you may also contact the Tolling Customer Ombudsman by mail, phone or mail:

Tolling Customer Ombudsman

Mail: PO Box 7095, Hawthorn VIC 3122
Phone: 1800 145 009
Email: admin@tollingcustomerombudsman.com.au
Web: www.tollingombudsman.com.au

You can also contact the Office of the Australian Information Commissioner. Details about how to do so are available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

8 Changes to our privacy policy

If we change our privacy policy, we will post the new privacy policy on our website and will take reasonable steps to notify you of the change (in most cases, by posting a notice on our website stating that a change has occurred).

All personal and credit information collected and held by us will be governed by our most recent Privacy Policy, as posted on our website. We encourage you to check our website regularly and to read any updates posted there.

ConnectEast is the owner and operator of EastLink

Mail: EastLink, PO Box 744, Ringwood, VIC 3144
Phone: 13 LINK (13 54 65)
TTY: 13 36 77
Speech to speech relay: 1300 555 727
Email: enquiry@breeze.com.au
Web: www.EastLink.com.au