



# PRIVACY POLICY

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Sustainable Energy Commitment Pty Ltd (ACN 661 911 459), us or we are a national organisation servicing clients around Australia. We are committed to managing personal and business information in accordance with relevant local privacy and data protection laws which apply to us such as the Australian Privacy Principles under the Privacy Act 1988 (Cth) and other local applicable privacy laws.

This document tells you how we generally manage your personal and business information and is referred to as our Privacy Policy. In this Privacy Policy, “we“, “us“, and “our” refers to Sustainable Energy Commitment Pty Ltd (SEC) and “you” refers to any individual we collect personal and business information about.

This Privacy Policy applies to all personal and business information collected by us, or submitted to us, whether offline or online, including personal and business information collected or submitted through our website <https://energyexemplar.com>, through our official social media channel pages which we control (such as our LinkedIn page), as well as through HTML-formatted email messages that we send to you.

## **ABOUT SUSTAINABLE ENERGY COMMITMENT**

Sustainable Energy Commitment Pty Ltd (SEC) offers a range of energy management solutions and certified sustainable energy commitment plan that is back by a technology service to monitor, record and report energy usage and maintain all progress of sustainable energy plan across the agreed time frame. Our software, headlined by MaxSE, is developed with Environment, Social and Governance (ESG) standards. We aim to continually develop novel approaches and more realistic performance measurement that enhance decision making, create market opportunities that benefit us all and enable users to become smarter, more energy efficient and profitable.

## **OTHER TERMS WHICH APPLY**

Other terms may also apply to you and the information we hold about you. For example, if you are employed with us you may have specific privacy terms in your employment contract with us.

Sometimes we also provide a privacy collection statement at the time we collect personal and business information from you. This privacy collection statement may include additional terms.



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## WHAT INFORMATION DOES SUSTAINABLE ENERGY COMMITMENT PTY LTD COLLECT ABOUT YOU?

Customers and prospective customers and other business partners

Our customers include:

- consultants;
- energy plant manufacturers;
- energy regulators;
- energy traders;
- system operators;
- commercial and industry firm;
- utility providers;
- policy makers;
- research bodies; and
- government agencies and ministries for energy.

We generally deal directly with our customers (see above). When your organisation enquires about our products or services or when your organisation becomes a customer of Sustainable Energy Commitment Pty Ltd (SEC), or we otherwise do business with you (because you attend an event we host, work for one of our suppliers, or other business partners), a record is made which may include your personal and business information.

The type of personal and business information that we collect will vary depending on the circumstances of collection and the purpose for which we are dealing with you, but will typically include:

- personal contact details such as your name, title, e-mail address, postal address and other business contact details (such as your LinkedIn profile);
- geolocation information based on your interactions with us online;
- information about your employer or an organisation who you represent;



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- your professional details (such as your job title);
- any additional personal or business information you provide to us, or authorise us to collect, as part of your interaction with Sustainable Energy Commitment;
- your energy usage such as electricity bills;
- Your renewable assets including but not limited to the location of all the relevant renewable assets, their types, the age, procurement details; and
- other contact details regarding our interactions and transactions with you and the organisation you represent.

In rare and specific circumstances, we may collect what is classified as “sensitive information” under applicable privacy laws. We only ever do this to the extent such sensitive information is relevant to our functions and activities and in accordance with applicable privacy laws.

## **Prospective employees/applicants**

We collect personal information when recruiting people to work with us, such as your name, title, date of birth, gender, contact details, qualifications and work history (including references and other information included in a CV or cover letter as part of the application process). Generally, we will collect this information directly from you

We may also collect personal and business information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). We may collect additional details such as current contractors’ license, drivers license, work permits, white cards and insurance policies.

We may also collect relevant information from third party sources such as LinkedIn and other professional websites. There may be other relevant privacy terms which apply to you in your employment contract.

## **WHAT HAPPENS IF YOU DON'T PROVIDE YOUR PERSONAL AND/OR BUSINESS INFORMATION?**

You can always decline to give Sustainable Energy Commitment Pty Ltd any personal and business information we request, but that may mean we cannot provide you with some or all of the services you have requested, or we may not be able to do business with you effectively. If you have any concerns about personal or business information we have requested, please let us know.



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## VISITORS TO OUR WEBSITES

The way in which we handle the personal and business information of visitors to our websites is discussed below.

## **(SEC) PTY LTD COLLECT AND USE YOUR PERSONAL AND/OR BUSINESS INFORMATION?**

Sustainable Energy Commitment Pty Ltd collects personal and business information reasonably necessary to carry out our business, to assess and manage our customer's needs, and to provide products and services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing customer and other business relationships.

The purposes for which Sustainable Energy Commitment Pty Ltd usually collects and uses personal and business information depends on the nature of your interaction with us, but may include:

- responding to requests for information and other general inquiries about our products and services (for example when you request a demo and / or ask you join our mailing list);
- managing our relationship with you if you are a customer, supplier or other business partner;
- managing, planning, advertising and administering programs and events which may be of interest to you including user group meetings and training;
- researching, developing and expanding our products and services; informing you of our activities, products and services;
- recruitment or onboarding processes (including for contractors, professional advisors); and
- responding to enquires and complaints.

Sustainable Energy Commitment Pty Ltd generally collects personal and business information directly from you. We may collect and update your personal and business information over the phone, by email, over the internet or social media, or in person. We may also collect personal and business information about you from other sources, for example:



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- our affiliated and related companies; and
- third party suppliers and contractors who assist us to operate our business.

Sustainable Energy Commitment Pty Ltd also collects and uses personal and business information for market research purposes, trend analysis and to innovate our delivery of products and services.

We have a legitimate interest in using your information in the ways listed above. In some cases, it will be lawful for us to collect and use your personal and business information, for example where it is necessary as part of our, or a third party's, statutory or public functions or because the law permits or requires us to.

## **HOW DOES SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD INTERACT WITH YOU VIA THE INTERNET?**

You may visit our websites (including [www.energyexemplar.com](http://www.energyexemplar.com)) without identifying yourself. If you identify yourself (for example, by logging onto a customer specific portal, a technical support portal or by providing your contact details in an enquiry), any personal or business information you provide to Sustainable Energy Commitment Pty Ltd will be managed in accordance with this Privacy Policy.

Sustainable Energy Commitment Pty Ltd websites make use of Google Analytics to look at how our websites are used. This is done by placing small text files, known as 'session cookies' on your device to collect information about how visitors use our websites. We use this information to compile reports and to help us improve our websites. The session cookies collect information in an anonymous form, including the number of visitors to our websites, where visitors have come to our websites from and the pages they have visited.

Sustainable Energy Commitment Pty Ltd websites may contain links to third-party websites. Sustainable Energy Commitment (SEC) Pty Ltd is not responsible for the content or privacy practices of websites that are linked to our website.

## **CAN YOU DEAL WITH SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD ANONYMOUSLY?**

Sustainable Energy Commitment (SEC) Pty Ltd will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Sustainable Energy Commitment (SEC) Pty Ltd to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not



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collect personal and business information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

## **HOW DOES SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD HOLD INFORMATION?**

Sustainable Energy Commitment (SEC) Pty Ltd stores information in electronic record keeping method in secure databases (including trusted third-party storage providers based in Australia). Personal or business information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal and business information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Sustainable Energy Commitment (SEC) Pty Ltd maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and multi-factor authentications to control access to our network systems.

## **HOW LONG WILL YOUR PERSONAL AND BUSINESS INFORMATION BE KEPT BY SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD?**

We will only keep the personal and business information we collect about you for as long as is necessary for the purposes set out in this Privacy Policy or as required to comply with any legal obligations to which we are subject. The retention periods we apply take account of:

- legal and regulatory requirements and guidance;
- limitation periods that apply in respect of taking legal action;
- our ability to defend ourselves against legal claims and complaints;
- good practice; and
- the operational requirements of our business.

We take steps to destroy or de-identify information that we no longer require or as required by an applicable law.



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## **DOES SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD USE OR DISCLOSE YOUR PERSONAL AND BUSINESS INFORMATION FOR DIRECT MARKETING?**

We have a legitimate interest in processing your personal and business information for promotional purposes and Sustainable Energy Commitment (SEC) Pty Ltd may use or disclose your personal and business information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you or as otherwise permitted under applicable privacy laws.

This means under certain privacy laws we do not usually need your consent to send you marketing communications such as our newsletter. However, where consent is required under applicable privacy laws, we will ask for this consent separately and clearly. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below or using the opt-out functionality contained in the electronic message.

If you opt-out of receiving marketing material from us, Sustainable Energy Commitment (SEC) Pty Ltd may still contact you in relation to its ongoing relationship with you.

## **HOW DOES SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD USE AND DISCLOSE PERSONAL AND/OR BUSINESS INFORMATION?**

For customers and other business partners

The purposes for which we may use and disclose your personal and business information will depend on the reason we are interacting with you. For example, if you have engaged us to deliver our products and services to your organisation, we may disclose information about you to our service providers where required to provide your organisation with the relevant products and services.

Disclosure to contractors and other service providers

Sustainable Energy Commitment (SEC) Pty Ltd may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for logistical services, data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.

Personal and business information may also be shared between related and affiliated companies of Sustainable Energy Commitment Pty Ltd, located in Australia.





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Third parties to whom we have disclosed your personal and business information may contact you directly to let you know they have collected your personal and business information, and to give you information about their privacy policies.

## Use and disclosure for administration and management

Sustainable Energy Commitment (SEC) Pty Ltd will also use and disclose personal and business information for a range of administrative, management and operational purposes. This includes:

- billing and payments and debt recovery;
- planning, managing, monitoring and evaluating our products and services;
- quality improvement activities;
- statistical analysis and reporting;
- training staff, contractors and other workers;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- responding to enquiries and complaints regarding our products and services;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations.

## Business sale or corporate transaction

We may share your personal and business information with third parties, whether affiliated or unaffiliated, for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale. In this context, your personal and business information may be transferred to another entity (or if such a sale, transfer, acquisition or corporate restructure is being contemplated by us).





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## Other uses and disclosures

We may use and disclose your personal and business information for other purposes explained at the time of collection (such as in a specific privacy collection statement or notice) or otherwise as set out in this Privacy Policy.

## **HOW CAN YOU ACCESS OR SEEK CORRECTION OF YOUR PERSONAL AND/OR BUSINESS INFORMATION?**

You are entitled to access your personal and business information held by Sustainable Energy Commitment (SEC) Pty Ltd on request. To request access to your personal and business information please contact our Privacy Officer using the contact details set out below.

We will take reasonable steps to ensure that the personal and business information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information, we hold about you and letting us know if your personal and business details change.

However, if you consider any personal and business information, we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal and business information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal and business information about the requested correction.

## **WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT ABOUT THE HANDLING OF YOUR PERSONAL AND/OR BUSINESS INFORMATION?**

You may contact Sustainable Energy Commitment (SEC) Pty Ltd at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal and business information has been handled.

You may make a complaint about privacy to the Privacy Officer at the contact details set out below.



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The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Sustainable Energy Commitment (SEC) Pty Ltd may have breached the Australian Privacy Principles or the Privacy Act 1988 (Cth), a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).

If you are outside of Australia, you may wish to take your complaint up with the local data protection authority in your jurisdiction.

## **HOW CHANGES ARE MADE TO THIS PRIVACY POLICY**

Sustainable Energy Commitment (SEC) Pty Ltd may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes. We also try to let you know about major changes to our Privacy Policy (for example by putting a notice up on our website).



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## HOW CAN YOU CONTACT SUSTAINABLE ENERGY COMMITMENT (SEC) PTY LTD?

The contact details for Sustainable Energy Commitment (SEC) Pty Ltd are:

Sustainable Energy Commitment (SEC) Pty Ltd Privacy Officer  
Tonsley Innovation District  
Suite 17, T8 Tonsley, 6 MAB Eastern Promenade  
Tonsley SA 5042  
[info@circularenergygroup.com.au](mailto:info@circularenergygroup.com.au)  
1300 884 281

This Privacy Policy was last updated in 6 June 2024.