



# Privacy Policy

At Southern Cross Broadband, safeguarding your personal information is our top priority. This Privacy Policy outlines our practices regarding the collection, usage, storage, and protection of your information. We urge you to carefully review this policy to understand how we handle your data.

Southern Cross Broadband comprises a group of companies, including Southern Cross Broadband Limited and its subsidiaries. We are committed to safeguarding the privacy of your personal information and act as data controllers as defined by EU Regulation 2016/679 (GDPR). Please refer to Part 1-5 of this Privacy Policy for a list of entities within the Southern Cross Broadband group operating under this policy. You can find the contact information for each relevant Southern Cross Broadband entity here.

This policy explains how Southern Cross Broadband collects, uses, shares, retains, and protects your personal information. It applies to all individuals, whether you are a website visitor, an employee, an employment applicant, a staff member of a Southern Cross Broadband customer, or any other private individual whose personal information is involved in Southern Cross Broadband's services or activities (referred to as "Data Subject" or "you"). Personal information encompasses any data related to an identified or identifiable natural person, as defined by privacy laws in the countries where we operate.

## Part 1: Customers

### Collection of Data from Customers

To provide our customers with services and related support, Southern Cross Broadband may need to collect and process specific data (referred to as "Collection Data"). This may include personal information related to customer staff or private individuals. Collection Data includes:

- Customer contact details (e.g., name, address, contact phone number).
- Customer credit card details.
- Credit information about the customer.
- Customer usernames and passwords for accessing Southern Cross Broadband's services.
- Records of customer usage of services and communications with Southern Cross Broadband.

Customers must ensure that they have obtained consent from their employees or authorized representatives before Southern Cross Broadband collects and uses their personal information in accordance with this Privacy Policy.

### Data Controller for Collection Data

Southern Cross Broadband Limited, or the local Southern Cross Broadband subsidiary in countries with such entities, acts as the data controller for Collection Data.

### Voluntary Provision of Collection Data

Providing Collection Data is voluntary, and individuals or entities provide it willingly. However, failure to provide necessary information may restrict Southern Cross Broadband's ability to deliver requested services.

### Collection Data Collection Methods

Southern Cross Broadband typically collects Collection Data when customers directly interact with the company. This includes interactions in person, via phone or email, or when entering customer details on the Southern Cross Broadband website. Southern Cross Broadband may also collect Collection Data from authorized representatives, employees, agents, contractors, suppliers, credit reporting bodies, credit providers, and other telecommunication and information service providers.

### Usage of Collection Data

Southern Cross Broadband uses Collection Data as needed to provide services and support to customers. This includes processing customer applications, conducting credit checks, provisioning services, handling customer inquiries and support, managing accounts, billing, investigating complaints, administering agreements, conducting research and development, business planning, staff training, communication about services, and informing customers about special promotions, subject to their consent.

### **Sharing of Collection Data**

Southern Cross Broadband may share Collection Data within its group of companies and with other organizations to deliver services to customers or protect its interests. Customer information will not be shared with third parties for marketing or other purposes without customer consent, except when necessary to provide services or protect Southern Cross Broadband's interests as required or permitted by law.

Collection Data may be disclosed to:

- Southern Cross Broadband's suppliers, resellers, and agents.
- Out-sourced service providers (e.g., contact centers, mailing functions, IT services).
- Credit reporting bodies, credit providers, or debt collection agencies.
- Other telecommunications and information service providers.
- Marketing channels.
- Legal, accounting, and financial advisers.
- Customer's authorized representatives.
- Government, law enforcement, and regulatory bodies to comply with legal obligations.
- Specified recipients in the event of a purchase or potential purchase of Southern Cross Broadband's business.

Organizations receiving Collection Data may be located outside the European Union, and Southern Cross Broadband ensures compliance with EU data protection laws when applicable.

### **Retention of Collection Data**

Southern Cross Broadband retains personal information in Collection Data only for the duration necessary to fulfill the specified purposes or as required by law.

### **Transmission Data**

In addition to Collection Data, Southern Cross Broadband transmits data packages containing personal data through its network (referred to as "Transmission Data"). Transmission Data includes:

- Technical data like IP addresses, routing information, transmission details, and data volume.
- Content data, such as the content of data packages transmitted via Southern Cross Broadband's network.
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### **Usage of Transmission Data**

Southern Cross Broadband processes Transmission Data to provide services to customers, establish connections, calculate usage fees, and detect and resolve network malfunctions or unlawful use of services.

### **Sharing of Transmission Data**

Transmission Data is shared with other network operators and service providers to facilitate data transmission and cooperate with government, law enforcement, and regulatory bodies when required by legal obligations.

### **Retention of Transmission Data**

Southern Cross Broadband deletes Transmission Data once the network connection is terminated, except when necessary for billing, resolving malfunctions, security incidents, or compliance with domestic laws.

## **Part 2: Recruitment**

### **Types of Personal Information Collected**

To process job applications, Southern Cross Broadband collects and holds personal information, including:

- Contact details (name, address, contact details).
- Employment-related information (resume, qualifications, employment details, referees, background checks, working rights checks, and police clearances).
- Records of communications with applicants.

Providing personal information for job applications is voluntary, but not providing it may affect the assessment and processing of the application. Southern Cross Broadband only processes sensitive personal data with explicit consent.

### **Collection and Storage of Personal Information**

Personal information is collected when applicants interact with Southern Cross Broadband directly or indirectly, including through referees, recruitment agencies, and third parties engaged to provide recruitment services.

### **Usage of Personal Information**

Southern Cross Broadband uses personal information for job application processing, employment decisions, record-keeping, and handling inquiries.

### **Sharing of Personal Information**

Personal information may be shared within the Southern Cross Broadband group of companies, with recruitment agencies, referees, third parties conducting background and police checks, institutions issuing qualifications, and government, law enforcement, or regulatory bodies as required by legal obligations.

#### **Retention of Personal Information**

Southern Cross Broadband deletes personal information upon the conclusion of the application process, unless the applicant is employed or consents to data retention for future job offers.

### **Part 3: Visitors to the Southern Cross Broadband Website**

#### **Types of Personal Information Collected**

Southern Cross Broadband may collect and process the following data from website visitors:

- Information voluntarily provided (e.g., name, address, email, phone, financial, and credit card information).
- Automatically collected technical information (e.g., IP addresses, browser details, page interactions).
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#### **Collection and Storage of Personal Information**

Personal information is collected when visitors voluntarily provide it or through automatic data collection during website visits.

#### **Usage of Personal Information**

Southern Cross Broadband uses this information to enable website usage, administer the website, improve website content, enhance security, and measure advertising effectiveness.

#### **Sharing of Personal Information**

Personal information may be shared with suppliers, sub-contractors, and selected third parties, including Southern Cross Broadband group companies, to fulfill website-related services.

#### **Retention of Personal Information**

Southern Cross Broadband retains personal information as long as necessary to fulfill the purpose for which it was collected or as required by applicable laws.

### **Part 4: Marketing and Promotional Activities**

#### **Consent for Marketing Communications**

Southern Cross Broadband may use personal information to communicate with you about services, offers, and promotions, including newsletters and direct marketing (collectively "Marketing Communications"). You can opt out of receiving Marketing Communications at any time by following the instructions provided in the communication or contacting us directly.

### **Part 5: Cookies and Tracking Technologies**

Southern Cross Broadband uses cookies and similar tracking technologies on its website. Detailed information about our use of cookies and tracking technologies, including your choices regarding such technologies, is available in our Cookies Policy.

### **Part 6: Security and Protection of Personal Information**

Southern Cross Broadband maintains security safeguards to protect personal information from unauthorized access, use, disclosure, alteration, or destruction. This includes physical, technological, and procedural security measures.

### **Part 7: Rights and Choices of Data Subjects**

#### **Access and Correction**

Data Subjects have the right to access their personal information held by Southern Cross Broadband and to correct inaccuracies. Requests can be made in writing to the contact details provided in this policy.

#### **Withdrawal of Consent**

Data Subjects may withdraw their consent for the processing of personal information, where consent is the basis for processing. This does not affect the lawfulness of processing based on consent before withdrawal.

#### **Other Rights**

Data Subjects may also have other rights under applicable data protection laws, such as the right to erasure (right to be forgotten), the right to restrict processing, the right to data portability, and the right to object to processing in certain circumstances.

**Complaints**

If you believe that Southern Cross Broadband has breached your privacy rights, please contact us using the contact details in this policy. We will investigate and respond to complaints within a reasonable timeframe. If you are dissatisfied with our response, you may refer the matter to your local data protection authority.

**Part 8: Updates to Privacy Policy**

Southern Cross Broadband may update this Privacy Policy periodically to reflect changes in our practices, services, and legal requirements. Updated versions will be posted on our website, and the date of the latest revision will be indicated at the top.

**Contact Us**

For any questions or concerns about this Privacy Policy, or to exercise your rights as a Data Subject, please contact us: [privacy@sxbb.net.au](mailto:privacy@sxbb.net.au)

Please specify the relevant Southern Cross Broadband entity, if applicable, when contacting us.