

Green Forms Trading Privacy Policy

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For the purposes of this Policy, the following definitions shall apply:

“**Green Forms**”, “**We**”, “**Us**” and “**Our**” means Cleantech Energy Solutions Pty Ltd ABN 92 621 781 726, its subsidiaries, Related Bodies Corporate, Related Entities, employees and agents.

“**Mobile Application**” means Our mobile device application known as “Green Forms Trading APP” as updated, altered or otherwise modified by Us from time to time.

“**Personal Information**” has the meaning defined in section 6 of the Privacy Act.

“**Policy**” means this privacy policy as amended from time to time.

“**Portal**” means the online transaction portal operated by Us, as updated, altered or otherwise modified from time to time, and accessed via the Website by entering Your username and password.

“**Privacy Act**” means the *Privacy Act 1988* (Cth).

“**REC**” means small-scale technology certificates (STC) and large-scale generation certificates (LGC) within the meaning of those expressions as used in the *Renewable Energy Energy (Electricity) Act 2000* (Cth) and includes the entitlement to create or register RECs.

“**Related Bodies Corporate**” has the meaning given in the *Corporations Act 2001* (Cth).

“**Related Entities**” has the meaning given in the *Corporations Act 2001* (Cth).

“**Sensitive Information**” has the meaning defined in the Privacy Act.

“**Services**” means the services We provide to You via the Website and Software for the creation, registration, aggregation and trading of RECs.

“**Software**” means the:

- (a) Mobile Application; and
- (b) Portal,

but excludes any software of Third Parties.

“**Third Party**” means any person, corporation or entity not related to Us.

“**Website**” means the website accessed at <https://greenformstrading.com.au/> and any links available from or within the Website, but does not include any external websites or links to external websites not belonging to or controlled by Us.

“**You**” and “**Your**” means the party receiving the Services or otherwise using the Website and or Software.

1. General

Cleantech Energy Solutions Pty Ltd ABN 92 621 781 726 trading as Green Forms Trading is committed to protecting the privacy of individuals. This Policy explains the way in which We collect, hold, use and disclose Personal Information by any means and by any technology in accordance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles and any other relevant privacy laws or regulations.

2. Scope

This Policy applies to Personal Information collected by Us from the use of the Website, Software and in the provision of the Services to You. By accessing the Website, using the Software, receiving our Services or otherwise providing Your Personal Information to Us, You consent to Our collection, use, holding and disclosure of Personal Information in accordance with this Policy.

3. Information We collect

3.1. What We collect from You

We collect Personal Information from You when it is necessary for the provision of the Services or other business purpose. The kinds of Personal Information We collect from You directly may include Your name, organisation/company name, address, telephone numbers, facsimile number, email address, drivers licence (or other form of photo identification), occupation, bank account details, credit card number, and any other information which is reasonably necessary in Our provision of the Services.

3.2. What We collect from Third Parties

We may collect Personal Information from a Third Party where You have expressly consented to its disclosure by that Third Party.

3.3. Online Resources

When You use the Website and Portal, We collect information which may include Your IP address, the date and time of Your visit, the pages accessed, the information downloaded and the type of browser used. We collect this information to help Us determine how and why people visit the Website and to improve the Services We offer.

3.4. Sensitive Information

We don't generally collect Sensitive Information about You, such as information concerning Your health, criminal record, religion, race or ethnicity. We will not collect Sensitive Information about You unless You consent to its collection and it is reasonably necessary for the provision of the Services, or its collection is required, permitted or authorised by the Privacy Act or other law.

With Your explicit consent or if required or allowed by law, We may collect Your genetic or biometric data (such as Your fingerprint, voice or facial features) which may be used to verify Your identity or as an extra means of security in applications (including the Mobile Application), when You choose for such authentication.

4. How We collect information

We collect Personal Information from You in a number of different ways which may include;

- when You provide that information to us directly, such as where You complete Our registration forms, applications or other forms required for the provision of the Services to You;
- when You correspond with Us via telephone, post or email;
- when You use Our online resources, such as the Website and Portal;

- where Third Parties provide that information, but only if You have consented to Us collecting the information this manner or You would reasonably expect Us to collect information about You from a Third Party; and
- where that information can be obtained from publicly available sources.

As noted previously, where Personal Information is collected using the Website and Portal, We may collect information concerning the server address/IP address, the date and time of Your visit, the pages visited, documents You have downloaded, the website You visited immediately prior, the browser You are using to access Our resources, if You have visited the Website or Portal before and tracking user preferences. Further, the Mobile Application may collect data as to Your location.

When accessing the Website, pieces of information called “cookies” will be transferred to Your hard drive which will allow the Website to remember important information and make Your use of the Website more efficient. We may also employ cookies so that We remember You when You return to the Website or Portal and to help customise Your Green Forms web experience. We may associate Personal Information with a cookie file in those instances.

If You do not wish to receive a cookie, You must adjust the settings of Your browser to either disable cookies or receive a notification when a cookie is received. If You disable all cookies, You may not be able to take advantage of all the features of the Website or Portal thus limiting the extent of the Services available to You.

5. Use of Personal Information

Generally, any Personal Information We collect will be used or disclosed for the purpose stated at the time of collection. We will seek further consent from You if We want to use Your Personal Information for any other purpose unless that other purpose is related to one of the original purposes of collection and You would reasonably expect us to use Your Personal Information for that other purpose.

We collect, hold, use and disclose Your Personal Information for the following purposes:

- as is reasonably necessary for Our provision of the Services;
- to provide You with information about Us and the Services, including via email, SMS, post, telephone or any other method of communication;
- information gathering or statistical assessment to assist us in improving the Services and the quality and usability of the Website and Software;
- to undertake marketing and promotion of Us and the Services;
- to comply with any applicable laws, regulations, codes and requirements of any relevant body or authority which regulates the Services; and

- any other purpose which You have consented to.

If You do not provide Us with the Personal Information we request, We will not be able to provide the Services to You. You also can refuse to give, or withdraw, Your consent in relation to any particular use of Your Personal Information at any time. However, again, if You refuse to give Your consent or withdraw Your consent for particular uses We will not be able to provide You with the Services.

6. Disclosure

We will hold and disclose Personal Information We collect for the particular purpose for which it was collected (**Primary Purpose**). We may disclose Your Personal Information for a purpose other than the Primary Purpose where We have obtained Your consent, for a purpose permitted by this Policy or are otherwise authorised by the Privacy Act or required by law. These include:

6.1. Other organisations

We may disclose Personal Information to Our Related Entities and Related Bodies Corporate to undertake marketing and promotion or who act on our behalf in connection with the Services.

6.2. Third Parties

Personal Information may be disclosed where We engage Third Party service providers or outsource certain services or functions, including mailing services, document storage services, direct marketing, data and identity verification services and information technology support. Organisations performing services on our behalf are required to comply with Our confidentiality and privacy requirements.

6.3. Government bodies or non-government agencies

We may be required to disclosure Personal Information to statutory bodies or agencies, such as the Clean Energy Regulator or any other relevant authority. For example, We are required to disclose Personal Information to the Clean Energy Regulator for the creation, validation and registration of environment certificates.

6.4. Overseas recipients

The Personal Information We collect is stored on secure servers in Australia. However, it may be necessary for Us to disclose Personal Information to overseas recipients for the storage of that information on cloud-based data storing facilities. Where Your Personal Information is collected, You consent to the transfer, storage and processing of that information outside of Australia.

6.5. Other disclosures

Personal Information will only be disclosed to Third Parties, other than those listed above, if:

- (a) You have expressly consented to Your Personal Information being supplied to others;
- (b) You would reasonably expect us to disclose information of that kind to a Third Party; or
- (c) We are authorised or required to do so by law or if it is necessary to assist with law enforcement.

7. Storage and Security of Personal Information

We understand the importance of ensuring Personal Information is protected from misuse, loss, unauthorised access, modification or unauthorised disclosure. As noted above, Personal Information We collect is stored electronically on secure servers in Australia however, there may be circumstances in which We physically hold that information in paper form at Our offices. Any hard copy records are kept under the strict control of staff members and employees.

In maintaining the integrity of Personal Information, some of the security measures We may use concerning electronically stored information include (but are not limited to):

- firewalls and access logging tools;
- secure work environments and workflow systems that prevent unauthorised access and copying of Personal Information and other data;
- secure server and closed network environments;
- encryption of data in transit;
- virus scanning tools;
- management of access privileges to ensure that only those who really need it can access Personal Information; and
- ongoing training and security reviews.

8. Direct marketing and “Opt In” mailing list

Using the Personal Information You provide, We may send You information relating to Us and the Services which includes marketing and promotional communications. For example, We may provide information to You via an electronic mailing list. This is an opt-in service meaning

we will not add Your email address to the mailing list without Your prior consent. You can only be added to the mailing list if You elect to receive emails from Us.

We may also use Sensitive Information We collect from You for the purpose of marketing and promotion in circumstances where You have consented to Our use or disclosure of information for that purpose.

We will provide You with a simple means by which You may request not to receive marketing communications from Us. We will not send such communications where You have asked Us not to.

9. Access and correction

Where You request access to Your Personal Information held by Us, We will provide access to You within a reasonable time after the request is made.

However, We may deny access to Your Personal Information to the extent permitted under the Privacy Act, which includes circumstances where We consider providing access would pose a serious threat to the life, health or safety of an individual or there would be an unreasonable impact on the privacy of others. In circumstances where access is refused, We will advise You in writing the reason/s We refused access and how You may make a complaint concerning our refusal.

If at any time You believe that Our record of Your Personal Information is not correct or out-of-date, please contact Us using the details below to arrange for correction of that Personal Information. In those circumstances or where We are satisfied that the Personal Information held is inaccurate, out-of-date, incomplete, irrelevant or misleading, We will take reasonable steps to correct that Personal Information so that it is accurate, up-to-date, complete, relevant and not misleading within a reasonable timeframe.

Before We provide access or make any corrections regarding Your Personal Information as referred to above, We will require proof and verification of Your identity.

10. Other websites

Our Website contains links to websites controlled by Third Parties (**Third Party Websites**). In visiting Third Party Websites, the collection, use or disclosure of any Personal Information will not be subject to this Policy. We are not able to determine or control how a Third Party will collect or use Your Personal Information and are not responsible for the privacy practices of Third Party Websites.

Before using any Third Party Websites, We recommend that You examine the privacy policy and any other terms and conditions of using those Third Party Websites as they may differ from Our Website.

11. Notification of Data Breaches

Where Your Personal Information held by Us has been lost, accessed or disclosed without Our authorisation and that loss, access or disclosure is likely to cause You serious harm, We will comply with the relevant notification requirements pursuant to Part IIC of the Privacy Act.

12. Changes to this Policy

We may amend this Policy from time to time and without notice. The updated Policy will be made available on Our Website at <https://greenformstrading.com.au/privacy>.

13. Questions or complaints

If You are concerned about how We have dealt with Your Personal Information, or otherwise have a complaint about a breach by Us of the Privacy Act and the Australian Privacy Principles, please contact Us using the following details:

Att: General Manager
Cleantech Energy Solutions Pty Ltd
2/176 Euston Road
Alexandria NSW 2015

Telephone: 1300 438 000
Email: techsupport@greenformstrading.com.au

We will endeavour to address Your complaint efficiently and within a reasonable timeframe. However, if You are not satisfied with Our response You may contact the Office of the Australian Information Commissioner via its website at <https://www.oaic.gov.au/> or 1300 363 992.

14. More on Privacy

You can obtain further information above privacy in Australia and the protection of Personal Information by visiting the Office of the Australian Information Commissioner's website at <https://www.oaic.gov.au/>.

