

SUB.CO GROUP PRIVACY POLICY

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Who we are and what we do

The Sub.Co group, which includes Sub.Co Pty Ltd (**Sub.Co Australia**), APX Partners Pty Ltd (**APX Partners**) and Sub.Co Singapore Pte Ltd (**Sub.Co Singapore**) and their related bodies corporate (together **Sub.Co**) respects your privacy. Sub.Co operates high capacity optical fibre cable networks and provides private line ethernet connectivity services to wholesale customers (**Services**).

This policy explains how Sub.Co collects your personal information through our Services and how we use, share, store and retain your personal information. In this Policy, personal information means any information relating to an identified or identifiable natural person.

How to contact us

Sub.Co Australia and APX Partners are Australian registered businesses. Sub.Co Singapore is a Singapore registered business. You can contact Sub.Co:

- + *By post* at Sub.Co Legal, PO BOX 10769, Brisbane QLD 4001
- + *By email* at privacy@sub.co

If you have an enquiry regarding privacy, or you wish to raise a complaint, you can contact Sub.Co's Data Protection Officer by email at privacy@sub.co.

Our collection of personal information

The personal information we collect from you will be apparent from the context in which you provide the information. In particular, we may collect your full name, email address, phone number, job title and other information for customer identification purposes as well as any other information you choose to provide directly to us: (i) as part of your business relationship with us, (ii) in connection with a potential business relationship with us, (iii) when you fill in an online form on our [website](#) or contact our team by phone or email, or (iv) when you give us your business card or contact details in person.

We may also collect personal information from other sources, such as representatives authorised to act on a customer's behalf, our employees, agents, contractors and suppliers, credit reporting bodies and credit providers and public sources.

How we use personal information

We use personal information for the purpose of entering into business relationships with prospective customers and suppliers, and to perform contractual obligations under the contracts that we have with customers and suppliers.

Activities that we conduct in this context include:

- (i) customer management, accounting, auditing, billing and debt collection activities;
- (ii) auditing activities;
- (iii) customer credit worthiness checks and vendor risk management;
- (iv) communications regarding services we provide or receive and related customer service;
- (v) investigating complaints and carrying out dispute resolution; and
- (vi) administering Sub.Co's agreement with each customer

In limited circumstances, we may need to process your personal information where required to comply with our regulatory and other legal obligations or for the investigation and enforcement of legal claims, debt collection via out-of-court procedures and other dispute resolution procedures to enable us to ensure that Sub.Co's rights are protected and to seek remedies if necessary.

We will not use your personal information for purposes other than those we have informed you of or as permitted or required by law or regulation.

We will retain your information for only as long as there is a business or legal need.

5. Who Sub.Co shares personal information with

- + *Government, Law Enforcement and Regulatory Bodies*

We may share personal information with government, law enforcement and regulatory bodies where this is required for Sub.Co to comply with legal and regulatory obligations.

- + *Service Providers.*

We may share your information with a small number of third party service providers who we engage to perform tasks or provide capabilities on our behalf, such as other telecommunications and information service providers, our customer relationship management tool and email services.

We may also share your information with Sub.Co's legal, accounting, human resources and financial advisers.

- + *Purchasers of Sub.Co business.*

If any Sub.Co company or substantially all of its assets are acquired by a third party, the personal information held by it about its customers will be one of the transferred assets.

- + *Credit reference bureaus*

Credit reference bureaus for the purpose of preparing credit reports or evaluation of creditworthiness.

6. Your rights and choices

Depending on your location and subject to applicable laws, you may have the following rights with regard to the personal information we control about you:

- (i) The right to request access to and rectification of personal information relating to you.
- (ii) The right to request that we erase your personal information in certain circumstances provided by law.
- (iii) The right to request that we restrict our use of your personal information in certain circumstances, such as while we consider another request that you have submitted.
- (iv) Where the processing of your personal information is based on your previously given consent, you have the right to withdraw your consent at any time.
- (v) The right to object to the processing of your personal information for direct marketing purposes or on grounds relating to your particular situation.

You can exercise the above rights by contacting us at privacy@sub.co.

You also have the right to lodge a complaint with your local supervisory authority, which will vary depending on your location.