Privacy Policy
(Embedded Network Customers)

1. Purpose

Realm is committed to protecting the privacy of all residential customers in embedded networks. This Privacy Policy outlines how Realm collects, manages, uses, stores, and discloses personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and the AER Exempt Selling Guideline Version 7.

As Realm frequently acts as an **agent for the embedded network owner**, this policy also explains how personal information may be shared with the network owner where required for billing, regulatory compliance, safety, or network operation. Realm will only share information with the network owner in accordance with privacy law and in a way that ensures customer confidentiality and safety.

2. Scope

This policy applies to:
- All personal information collected by Realm.
- All embedded network customers for whom Realm provides billing, reporting, or customer support services.
- All staff, contractors, and agents acting on behalf of Realm.
- All situations where Realm acts as an **agent of the embedded network owner**.

It covers electricity, hot water, thermal energy, and water billing operations.

3. Regulatory Framework

This policy complies with:
- Privacy Act 1988 (Cth) and APPs.
- AER Exempt Selling Guideline v7 privacy and data-handling conditions.
- National Energy Retail Rules (NERR) where applicable.
- Exempt seller conditions for R1–R5 residential customers.

Realm's responsibilities under this policy apply equally whether Realm is the exempt seller or acting on behalf of the exempt seller (the network owner).

4. Types of Information Collected

Realm may collect the following information:
- Customer name, address, and contact information.
- Meter identifiers, NMI, consumption data, and meter access details.
- Billing history, payment information, and direct debit details.
- Move-in, move-out, and update forms.
- Information relating to complaints, hardship, or support needs.

- Information relevant to network ownership responsibilities.

Realm will not collect more information than is required for billing, compliance, or safe network operation.

5. How Information Is Collected

Realm collects information:
- Directly from customers via forms, email, phone, or the customer portal.
- From the embedded network owner for whom Realm acts as agent.
- From Bodies Corporate, strata managers, or site managers when authorised.
- From meter data, bulk bills, and network operators.
- Through Realm's website and digital systems.

When acting as agent for a network owner, Realm may receive information from the owner and may need to provide updated customer information back to the owner.

6. Use of Personal Information

Realm uses personal information to:
- Provide billing and account management services.
- Support network operation and regulatory compliance.
- Verify customer identity.
- Communicate regarding bills, payments, outages, or service issues.
- Process payments and manage direct debits.
- Support customers experiencing hardship or family violence.

Acting as agent:
When Realm provides services on behalf of an embedded network owner, Realm may share relevant customer information with the owner so they can discharge their legal, operational, and regulatory responsibilities. Such sharing will always be limited to what is necessary and lawful.

7. Disclosure of Information

Realm may disclose personal information:
- With customer consent.
- To the embedded network owner when required for billing, safety, regulatory compliance, or network operation.
- To Bodies Corporate or authorised site managers where required.
- To payment processors (e.g., Merchant Warrior) and IT service providers.
- To regulators such as the AER, where required.

- To emergency services if necessary to prevent harm.
- Where required by law.

Realm **does not sell or trade** customer information.

8. Embedded Network Considerations

Realm recognises unique privacy considerations in embedded networks:
- Network owners legally retain responsibility for infrastructure and must receive essential account information.
- Meter rooms and postal locations may be shared within the community.
- Multiple residents may be associated with the same supply address.

Realm ensures that only authorised individuals (including the network owner) receive relevant information.

9. Data Security & Storage

Realm protects personal information through:
- Encrypted digital storage.
- Restricted-access internal systems.
- Regular cyber-security audits.
- Role-based access for staff.

Information is stored in Australia unless otherwise required and retained only as long as legally or operationally necessary.

10. Customer Access & Correction

Customers may request access to their personal information or request corrections. Realm will respond within a reasonable timeframe unless prevented by law or safety concerns.

11. Complaints Handling

Privacy complaints may be submitted via:
Email: enquiries@realmcorp.com.au
Phone: 1300 989 438

Realm will acknowledge complaints within 5 business days and aim to resolve them promptly. Customers may also contact the Office of the Australian Information Commissioner (OAIC).

12. Governance & Compliance

Realm will:

- Train staff annually on privacy obligations and embedded-network specific considerations.
- Maintain internal processes for privacy incident management.
- Review this policy annually.
- Report material privacy breaches where required.
- Ensure all agent-related information sharing is lawful and proportionate.

13. Version Control

Version: 1.1

Approved by: David Reid, Director

Effective Date: November 2025

Next Review: November 2026