



Client Privacy Policy BlueOak

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Client Privacy Policy

Demonstrate the organization's commitment to safeguarding and appropriately handling our employees' and contractors' personal information.

Privacy Policy – BlueBilling

Blue Oak Solutions Australia Pty Ltd (ACN 111 857 277) and its related bodies corporate (hereafter 'Blue Oak', 'we', or 'us') is based in Australia. Our collection, use, and storage of personal information is governed by the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs), and, where applicable, the European Union General Data Protection Regulation (GDPR) for individuals located in the European Economic Area (EEA). We are committed to protecting the privacy of your customers' personal information, and this Privacy Policy outlines our ongoing obligations to you in respect of how we manage your customers' personal information.

'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not. Under the GDPR, this is referred to as 'personal data'.

By continuing to use our BlueBilling platform, you consent to us collecting, using, and disclosing customer personal information that you or your customers supply, in accordance with this Privacy Policy.

What Information We Collect

The type of information that we collect about your customers will depend on how your customers use our BlueBilling platform and what products and services you use from our offerings. The customer personal information that we collect and hold about your customers may include:

- Full name
- Company name
- Email address
- Contact number
- Postal and tenancy addresses
- Usage information, such as the date and time of their access, IP address, pages visited, and actions taken on those pages
- Electricity usage information

How We Collect Your Information

We may collect your customers' personal information whenever you or the customer input such information into our BlueBilling platform.

We also use cookies, which are small data files transferred to a computer by a website or its service provider. Cookies capture and remember certain information regarding the use of the website. It is not possible to identify individuals personally from our use of cookies. We use cookies to help us track website usage and customize the website experience.

Most web browsers automatically accept cookies, but you can choose to disable cookies through your internet browser settings. However, our website may not operate as intended if you do so.

Purpose of Collection

We collect, hold, use, and disclose your customers' personal information to:

- Offer and provide products or services to you and your customers
- Operate, protect, improve, and optimize our business and your experience
- Maintain contact with you in relation to our business and your use of our products and/or services
- Keep you informed of new developments, products, and services available
- Respond to enquiries and complaints
- Fulfill administrative functions such as billing, entering into contracts with you and/or third parties, and managing client relationships
- Comply with our legal obligations

Where we process personal data under GDPR, we rely on the following legal bases:

- **Consent:** For direct marketing or where you or your customers explicitly provide consent.
- **Contract:** To fulfil our obligations under contracts with you.
- **Legitimate Interests:** For improving our services, product functionality, and customer experience, provided your or your customers' rights do not override these interests.
- **Legal Obligation:** To comply with applicable laws.

By using our products and services, you consent to receiving direct marketing material to inform you about our products or services, upcoming promotions and events, or other opportunities that may interest you. We will only use your personal information for this purpose if we have collected such information directly from you and if it is material of a type which you would reasonably expect to receive from us. We do not use customer personal information in direct marketing activity.

If you do not wish to receive direct marketing communications, our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, or you may contact us directly.

Storage of Information

We will store personal information only for as long as needed for the purposes described above or as required by law. When personal information is no longer needed, we will securely delete or anonymize it.

We take all reasonable precautions to safeguard your customers' personal information from loss, misuse, unauthorized access, theft, modification, or disclosure. We also limit access to personal information to our personnel on a need-to-know basis.

Security of Information

We are committed to maintaining robust security measures to protect your customers' personal information. Our information security practices are aligned with the **ISO 27001** standard, an internationally recognized framework for information security management. We undergo regular **independent third-party audits** to ensure compliance with ISO 27001 and to verify the effectiveness of our security controls. Additionally, we conduct **regular penetration testing** to identify and address potential vulnerabilities in our systems, ensuring that your customers' personal information remains secure against unauthorized access, loss, or breach.

Third Party Disclosure and Overseas Transfer of Information

We may disclose personal information to service providers who assist with managing our BlueBilling products and services, such as hosting providers or analytics services. These providers are contractually obligated to protect your customers' information and comply with applicable data protection laws.

All your customers' personal information resides in Australia, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or equivalent measures, to protect the data in accordance with applicable laws.

Other than this, we do not sell or otherwise trade to unrelated third parties your customers' personal information that we collect unless we receive your consent to such disclosure.

Your Individual Rights

If you or your customers are located in the EEA, or where GDPR applies, you and your customers have the following rights regarding personal data:

- **Right to Access:** You or your customers can request confirmation of whether we are processing personal data and access to that data.
- **Right to Rectification:** You or your customers can request correction of inaccurate personal data.
- **Right to Erasure:** You or your customers can request deletion of personal data under certain conditions, such as when it is no longer needed for the purposes for which it was collected.
- **Right to Restrict Processing:** You or your customers can request restriction of processing in specific circumstances, such as while we verify the accuracy of the data.
- **Right to Data Portability:** You or your customers can request a copy of personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** You or your customers can object to processing based on legitimate interests or direct marketing.
- **Right to Withdraw Consent:** Where processing is based on consent, you or your customers can withdraw it at any time without affecting the lawfulness of processing prior to withdrawal.

To exercise any of these rights, please contact our Data Privacy Officer at privacy@blueoak.com.au. We will respond to your request within 30 days, in accordance with applicable laws.

Contact Us

For questions, requests to access or correct your or your customers' personal information, or to exercise any of your or their rights, please contact our Data Privacy Officer at privacy@blueoak.com.au

If you wish to make a complaint concerning the manner in which we maintain the privacy of your customers' personal information, please contact our Data Privacy Officer. If we agree that your complaint is well-founded, we will endeavor to rectify the problem. Should you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner (for Australian residents) or the relevant data protection authority in your country (for EEA residents).

Updates to Privacy Policy

We may modify this Privacy Policy at any time, in our sole discretion, and all modifications will be effective immediately upon our posting of the modifications on our website. When we change our privacy policy we will notify you about it by email. We encourage you to review this Privacy Policy periodically to stay informed about how we protect your personal information.