



Privacy Policy

Title:	Privacy Policy
Approved by:	QCN Board
Responsible lead:	Chief Executive
Audience:	Public, Customers, Partners, Suppliers, QCN
Brief description:	Sets out how QCN meets the requirements of the Privacy Act 1988 (Cth)
Periodicity of review:	Annual review
Approved:	March 2026
Next Scheduled Review Date:	March 2027

Version History

Version	Date	Section(s)	Summary of Amendment
1.0	20/09/19	All	Amendments reflecting change in the company name from FibreCo to QCN. Amended postal address and added relevant contact details
2.0	07/11/19	3.1	Amendment to cover information collected from website users in the “contact us” functionality of QCN’s website
3.0	21/03/2022	All	Three-yearly review
4.0	25/03/2025	All	Three-yearly review and updates to comply with new Privacy Act legislation
5.0	30/03/2026	All	Three-yearly review

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1 Introduction

- 1.1. This Privacy Policy sets out how Queensland Capacity Network Pty Ltd (**QCN, we, us, our**) handles your personal information if you are an employee, officer or agent of one of our customers, suppliers, contractors or partners, if you are an end-user of a QCN telecommunications service or if you are a visitor to our website.
- 1.2. We are governed by the Privacy Act 1988 (Cth) (**Privacy Act**) and comply with the Australian Privacy Principles (**APPs**) contained in Schedule 1 of the Privacy Act. In this Privacy Policy, *personal information* has the same meaning as in the Privacy Act, namely information or an opinion about an identified individual or an individual who can be reasonably identifiable, regardless of whether the information or opinion is true and regardless of whether the information or opinion is recorded in a material form. You can access the Privacy Act via the Federal Register of Legislation at <https://www.legislation.gov.au/>.
- 1.3. We may update this Privacy Policy from time to time. If we do so, we will publish the updated Privacy Policy on QCN's webpage.
- 1.4. If you have any questions about us, this Privacy Policy or how we handle your personal information, please contact us using the contact details in section 14 below.

2 Who we are and our products and services

- 2.1 We are a wholesale telecommunications provider. We provide carriage services and hold a telecommunications carrier licence. Our primary purpose is to improve access to digital services for regional Queenslanders.
- 2.2 Our customers are primarily Australian companies and include other telecommunications carriers, carriage service providers, government entities and other organisations.

3 Our customer third party privacy consents

As a wholesale telecommunications provider, we require our customers to ensure they have obtained all relevant privacy consents and made all necessary notifications required by the Privacy Act regarding personal information our customers make available to us.

4 The kinds of personal information we collect and hold

- 4.1 We collect and hold personal information to run our business and carry out our business functions and activities. The kinds of personal information we collect will usually depend on your relationship or interaction with us.
- 4.2 **Information about our customers' personnel and end users**

To provide our customers with telecommunications services, maintain those services and manage our customer contracts and relationships, we collect and hold the following kinds of personal information:

 - (a) name, title, signature, phone number, email address, postal address of customer personnel. We may also require identification information (such as passport or drivers' license, biometric access information or information captured by video surveillance of QCN facilities) of customer personnel in the event that we require such information for security purposes in connection with access to relevant telecommunications facilities;

- (b) technical and verification information of customer personnel including their IP addresses, email addresses, user access logs, usernames, passwords and any personal information included in technical support tickets; and
- (c) end user data that is transmitted via a QCN telecommunications service, but only to the extent that we require such data to comply with any interception obligations under applicable law.

4.3 **Information about the personnel of our suppliers, contractors and partners**

To procure services, conduct tenders and manage our supplier, contractor and partner contracts, we collect and hold the following kinds of personal information:

- (a) supplier and contractor names, titles, signatures, phone numbers, email addresses, postal addresses, Australian Business Numbers (ABNs) and organisation names; and
- (b) payment and financial information, such as bank account details and credit standing. We may also require identification information such as a passport or a driver's license details in the event that we require such information for security purposes in connection with access to relevant telecommunications facilities.

4.4 **Information collected when you visit our website**

- (a) When you browse our website, we may collect information about how you interact with our website. The purpose of collecting this information is to improve your browsing experience and to help us manage our website. The type of information we may collect includes:
 - (i) location and site information: such as the pages you visit, any documents you download, search terms you use and the date and time of your visit; and
 - (ii) technical information: such as your IP address, the types of devices you are using to access our website, your computer operating system and the type of browser you use (e.g. internet explorer).
- (b) We collect this information by using cookies. Cookies are small text files transferred from our website and stored on your device by your internet browser. They are used to hold relevant information about your visits and to improve your experience the next time you visit the website. You can block cookies or you can change your browser settings to delete or clear cookies currently stored.
- (c) Other than where you enter your name or contact details into a form on our website, we only collect the information referred to in this section 4.4 in a form that cannot reasonably be expected to identify you. In the event that you enter personal information into a form on our website, we will use the information for the purposes of responding to the matters described in the form.

4.5 **Sensitive information**

- (a) Under the Privacy Act, additional obligations are imposed in respect of the collection, use and disclosure of 'sensitive information'. Sensitive information includes, among other things, personal information about a person's racial or ethnic origin, religious beliefs, health or biometric information, criminal record, political associations or sexual orientation.
- (b) Some personal information we collect will be sensitive information, such as identification documents (passport or driver's licence), or information captured by video surveillance of QCN facilities. We will only collect sensitive information with your express consent.

4.6 You may interact with us without identifying yourself or by using a pseudonym to enquire about our products and services. However, we may not be able to provide services to you or respond to your query or complaint if we are not able to identify you.

5 How we collect personal information

We will collect personal information:

- (a) directly from you, such as when you contact us (whether by email, phone or online forms via our website), for example, to request our services, to make an enquiry, to lodge a complaint or when we contact you, for example, to procure services from you or partner with you or otherwise engage you; or
- (b) indirectly when we ask others about you, such as, for example where we obtain supplier credit information about you if you are a supplier.

6 How we use personal information

We use personal information as set out in the following table:

Category	How we use and process personal information
Personal information about customer's and their personnel	<ul style="list-style-type: none"> ▪ To provide services to customers. ▪ To setup, configure or procure a service for a customer and so that our customers' personnel and end-users can use our services. ▪ To communicate with customers about their current and prospective use of our services, including with respect to their current and anticipated usage of the services. ▪ To provide customers with technical support and maintenance services including by responding to help desk tickets, scheduling upgrades and enhancing our services. ▪ To send out billing information and notices and process payments. ▪ To discuss our security requirements and to understand a customer's security requirements in respect of our services. ▪ When conducting research and development of our services. ▪ To provide customers with information about new solutions that we make available and to process orders for new or additional services. ▪ To identify a customer or its personnel when they contact us for technical support or to enquire about a service. ▪ To administer our contractual relationships with a customer (and to enforce our contractual rights). ▪ To configure new services for customers or to make changes to existing services. ▪ To handle complaints.
Personal information about end-users	<ul style="list-style-type: none"> ▪ To comply with interception obligations under applicable law. ▪ To carry out security audits, investigate security incidents and implement security processes and procedures that require access to individuals' personal information. ▪ To handle complaints.
Personal information about our suppliers, contractors and partners	<ul style="list-style-type: none"> ▪ To operate our businesses and manage our relationships. ▪ To send out billing information and notices to suppliers, contractors and partners and process payments. ▪ For workplace health and safety reasons. ▪ When developing our services. ▪ To procure new products and services from our suppliers and contractors.

	<ul style="list-style-type: none"> ▪ When escalating technical support requests. ▪ To handle complaints.
Website visitors	<ul style="list-style-type: none"> ▪ When a visitor to our website enters personal information into a form on our website, we use the information for the purposes described in the form.

7 How we store and secure/protect personal information

7.1 We store personal information we collect in our own offices and premises, in our computer systems and in third party owned and operated hosting facilities.

7.2 **Electronic records:** We hold:

- (a) emails on our own servers and on third party cloud-based email providers which have restricted access security protocols;
- (b) customer or prospective customer personal information on third party owned cloud-based customer relationship management (CRM) providers;
- (c) personal information electronically on our computers and our devices in our premises;
- (d) personal information on third party hosting facilities operated by reputable hosting providers.

7.3 **Paper records:** We hold all hard copy personal information in files and folders in lockable, secure cabinets within restricted secure locations in our offices and premises.

7.4 **Security:** We use reasonable security precautions to protect personal information we hold from unauthorised access, disclosure, misuse, or interference by implementing appropriate security safeguards and technical and organisational measures including the following:

- (a) security testing and other electronic measures for the purposes of securing personal information, such as passwords, anti-virus management and firewalls;
- (b) security reviews of our systems to identify and eliminate potential security risks in our electronic and physical infrastructure;
- (c) physical security measures in our buildings and offices such as door and window locks and visitor access management, cabinet locks, surveillance systems and alarms to ensure the security of information systems (electronic or otherwise);
- (d) we require all our employees, suppliers, contractors and partners to comply with contractual privacy and confidentiality provisions in their agreements with us;
- (e) we monitor and review our devices, systems and networks. This may be performed by our suppliers and contractors;
- (f) we ensure we have appropriate data backup archiving, data breach response plans and disaster recovery processes in place;
- (g) we implement passwords and access control procedures into our computer systems including appropriate password hygiene protocols and updates to security controls; and
- (h) undertake appropriate deletion, destruction or de-identification of personal information consistent with our data retention policy or under applicable law.

- 7.5 **Staff:** We inform staff of our privacy and information security requirements and all QCN personnel are contractually required to comply with privacy and confidentiality obligations and all relevant policies.

8 Who we share your personal information with

8.1 We may share your personal information with:

- (a) appropriately authorised staff;
- (b) suppliers and contractors; and
- (c) the owners and operators of telecommunications networks and facilities that we resell access to, including Powerlink Queensland and Energy Queensland.

8.2 We may also share your personal information with others such as:

- (a) when we engage third party contractors to perform some of our obligations to you;
- (b) when providing information to our legal, accounting or financial advisors/representatives or insurers, or to our debt collectors for debt collection purposes;
- (c) with your expressed written consent to your advisors or representatives;
- (d) if required by government and law enforcement agencies to comply with law;
- (e) in relation to legal proceedings before any court or tribunal (whether commenced or reasonably in contemplation);
- (f) if our ownership or control or part of our business changes, we may transfer your personal information to new owner, subject to appropriate contractual privacy and confidentiality requirements;
- (g) the shareholding Ministers (as defined in the Government Owned Corporations Act 1993 (QLD)) of QCN's shareholding entities; and
- (h) if we are required by law or expressly permitted by the Privacy Act.

9 How long we keep personal information

We keep personal information in line with our legal and regulatory retention periods and in accordance with our record keeping policy. We destroy or de-identify personal information when it is no longer needed for the initial purposes collected under our Privacy Policy, or where otherwise reasonable in the circumstances to do so.

10 Overseas transfer of personal information

- 10.1 We may share personal information with our overseas service providers and personnel who assist us with providing services and to assist us with the operation of our businesses generally.
- 10.2 When we share personal information overseas, we take reasonable steps to ensure that overseas recipients comply with the Australian Privacy Principles.
- 10.3 Our contractors, suppliers and partners (including service providers) are currently located in Australia and overseas, in the United Kingdom and the United States of America.

11 Third party websites

Our website may contain links to third party websites. This Privacy Policy does not apply to these third party websites and we do not warrant or represent that any third party website complies with applicable privacy laws. Please consider the privacy policies of any relevant third party website prior to providing personal information to them.

12 Your rights to access, amend or correct your personal information

- 12.1 You may issue a request to us to access, update or correct personal information we hold about you. We will need you to verify your identity and to specify what information you require, usually in writing. This is to ensure we only disclose information about you and not any other person.
- 12.2 You can request access to or the correction of your personal information that we hold about you for free. However, we may charge our reasonable costs for photocopying or time spent collating the information you request.
- 12.3 To make a request, please contact us via the contact details set out in section 14 below. We will endeavour to respond to your request within 14 days from the date we receive your request.

13 Privacy complaints

- 13.1 If you have a complaint about the way we handle your personal information or any privacy request, please contact us using the details in section 14 below. We will use our best endeavours to resolve any privacy complaint with you within a reasonable time and within 30 days from the date we receive your complaint.
- 13.2 If you are not satisfied with our response or you can contact the Office of the Australian Information Commissioner (**OAIC**):

Telephone: 1300 363 992

Website: <https://www.oaic.gov.au/about-us/contact-us> and use the complaint form at <https://webform.oaic.gov.au/prod?entitytype=Complaint&layoutcode=ComplaintWF>

Address: GPO Box 5288, Sydney NSW 2001

Phone: 1300 363 992

14 QCN's contact details

If you have a privacy concern, please contact us using the following contact details:

Address: Operations Director
Queensland Capacity Network Pty Ltd
L.15, 348 Edward Street
Brisbane, QLD 4000

Email: privacy@qcn.com.au

Phone: 1800 726 342

This Privacy Policy was last updated on 30 March 2026.