



M2 GROUP LTD

PRIVACY POLICY

M2 Group Ltd ACN 74 091 575 021 (**M2, we, us, our**) is a public company listed on the Australian Securities Exchange. M2's ordinary securities trade under ASX code "MTU".

M2 is the parent company of subsidiaries which supply telecommunications products and services, supply energy (specifically gas and electricity) and insurance products. Each such subsidiary has developed its own Privacy Policy and is available for viewing or download on the relevant subsidiary's website.

This Privacy Policy describes the practices and processes M2 has in place to properly manage and safeguard information it receives in connection with its functions and activities. Primarily, that information relates to its former, current and prospective shareholders.

Privacy laws that apply to M2

M2 is required to comply with the *Privacy Act 1988* (Cth) and is bound by the Australian Privacy Principles ('**APPs**') set out in that Act. The APPs establish minimum standards for the collection, use, disclosure and handling of personal information. They apply to personal information in any form, including electronic and digital form. The APPs can be accessed at the website of the office of the Australian Information Commissioner: www.privacy.gov.au.

M2 is also subject to other laws relating to the protection of personal information. If M2 engages in direct marketing activities, M2's direct marketing activities may also need to comply with the *Do Not Call Register Act 2006* (Cth) and the *Spam Act 2010* (Cth). If M2 collects health information, it may be required to comply with statutory requirements relating to health records.

In this Privacy Policy, unless the context otherwise requires:

- 'Privacy Law' refers to any legislative or other legal requirement that applies to M2's collection, use, disclosure or handling of 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 and whether the information or opinion is recorded in material form or not. Personal information includes sensitive information.
- 'Sensitive information' means personal information about an individual's racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs, professional or trade association/union memberships, sexual preferences and practices or criminal record.

Why does M2 collect personal information?

M2 collects personal information in order to, amongst other things:



- receive, review and respond to queries from its shareholders and other stakeholders;
- providing services to its Stakeholders, either by itself or through its share registry, including providing services to shareholders in connection with their holding in M2;
- market and promote the products and services of its subsidiaries to current and prospective customers of its subsidiaries; and
- comply with our legal obligations, including under the *Corporations Act 2001* (Cth).

M2 needs to be able to collect personal information for most of its corporate activities, although the information we require depends on the particular circumstances. If we are unable to collect the personal information we need, we may be unable to meet the expectations of our Stakeholders or provide the services they wish to receive.

Whose personal information does M2 collect?

M2 collects or holds personal information about individuals who are:

- **Prospective shareholders.** This primarily includes people who have expressed interest in becoming a shareholder in M2.
- **Current shareholders.** This includes people who currently hold shares in M2.
- **Past shareholders.** These are people who have been a shareholder in M2 or its subsidiaries in the past but do not currently have a shareholding in M2.
- **Analysts.** There are people who analyse shares in M2 and may provide recommendations or reviews in respect of its shares.
- **Journalists.** There are people who report on shares in M2 in the media. Generally, these people are also analysts and closely follow M2's shares.

M2 may collect personal information about associates of its shareholders, such as family members, employees or agents. For example, M2 may collect personal information about nominated or authorised representatives, the holder of a bank account into which dividends are paid, the trustee or agent of a shareholder, a person who acts as a proxy or body corporate representative of a shareholder, proxy advisors or the nominated contact in respect of the holding.

M2 may in rare circumstances collect personal information from people who are under the age of 18. If M2 does this, M2 may also collect personal information about the parent or guardian of that person.

M2 also collects personal information about all the individuals who are involved in the performance by M2 of its functions and activities. This includes:



- staff of M2 and its subsidiaries; and
- service providers and suppliers, agents and affiliates, and their staff.

Can you deal with M2 without identifying yourself?

In some limited situations shareholders and other individuals may be able to deal with M2 anonymously or using a pseudonym. For example, an individual may make a general investor inquiry (such as requesting a copy of M2's annual report or information relating to M2's general meetings) without identifying themselves.

However, if you do not wish to be identified we may not be able to provide the information or assistance you require. This is particularly the case where the information or assistance relates to a specific shareholding.

What personal information does M2 usually collect?

M2 collects a wide range of personal information about its shareholders, but the type and amount of information collected depends on the particular context. However, M2 seeks at all times to ensure that it only collects the personal information that is necessary for the purposes of its functions and activities.

M2 needs to collect basic identifying and contact information for all shareholders, including prospective shareholders. This will usually include name, date of birth, email address, telephone number(s) and address of the shareholder and any attorney. Additionally, for corporate shareholders, M2 collects information about nominated contacts or representatives, including name and title or position, date of birth, telephone number(s) and email and business addresses.

M2 may also collect information it requires to better engage with its shareholders. Such information may include the name, title or position, telephone number(s) and email and business address of individuals who are responsible for influencing the voting decisions by the shareholder. This includes proxy advisors and collective engagement service providers (and their employees, contractors and agents) utilised by institutional shareholders.

Similarly, M2 may also collect information for analysts and journalists in order to better engage with them. This will usually be limited to name, title or position, telephone number(s) and email and business addresses.

When you become a shareholder in M2, M2 collects a range of other information that it needs to manage your holding. This may include:

- **Full name** of the individual shareholder and if applicable, of the trustee.
- **Information relating to any Power of Attorney**, including the name, address, telephone number(s), residential address, occupation and date of birth of the attorney.



- **Credit card details.** We may need your credit card details if you elect to make any payments you are required to make to M2 by credit card.
- **Bank account details.** We may need your bank account details if you have elected to receive your dividends paid into your bank account.
- **SRN and HIN.** We may require any existing SRN or HIN that you have.

We may also collect information in respect of our dealings with our shareholders. This includes information about:

- share trading patterns and history;
- inquiries and complaints; and
- responses to offers made and/or promotions run by M2's subsidiaries.

We also collect information about our share registry, suppliers, service providers, agents and affiliates, and their staff, for the purposes of conducting our day-to-day functions and activities.

How does M2 collect personal information?

We collect personal information by various means and via various media, depending on the particular business context.

We collect information directly and via our share registry. We may collect this information:

- when you make an inquiry about M2, including about its performance and shares;
- through investor days and other investor engagement activities;
- through contacting our investor relations team, corporate communications team or company secretary;
- through documents you submit to us in connection with your shareholding;
- through questions you ask during our general meetings; and
- through M2's website, including where you submit inquiries.



M2 receives unsolicited personal information from time to time. In accordance with its obligations under Privacy Law, M2 will decide whether it would have been permitted to solicit and collect that information and if it would not have been, will destroy or de-identify the information (provided it is lawful to do so).

What information will M2 give you when it collects personal information?

M2 is required by Privacy Law to take reasonable steps to ensure that you are made aware of certain information when it collects personal information about you. For example, we are required to:

- tell you how to contact M2;
- make sure you are aware that we have collected the information (if we collect it from a third party without your knowledge);
- identify any law that authorises or requires collection of the information;
- let you know the purposes for which we collect the information, the entities that the information is likely to be disclosed to and whether the information will be transferred outside Australia; and
- tell you how to access our Privacy Policy and complaint handling procedures.

This Privacy Policy sets out this information in general terms. However, where we collect personal information in relation to a particular issue or matter, and the information we are required by the APPs to provide to you in respect of the collection is not likely to be obvious from the circumstances, we usually provide the required information in a 'collection statement'. The way we do this will depend on how you are dealing with us. For example:

- When personal information is collected via the M2 website, a statement is displayed or a link provided to a statement that sets out the information we are required to provide to you in respect of the collection.
- When you deal with us on the telephone, this information is given to you by the operator or via a recorded message.

If we collect personal information about you from a third party, such as our share registry, we take reasonable steps to ensure you receive the information we are required to provide. However, we may do this by requiring the third party to provide the information, rather than us providing the information to you directly.

We may also include information about our collection of personal information in investor packs and other documents we give to our shareholders from time to time.



M2's use and disclosure of personal information

Where M2 collects personal information for a particular purpose, it may use and disclose the information for that purpose or another purpose that is related to that purpose (or that is directly related to that purpose in the case of sensitive information). For example:

- Personal information collected from you for the purpose of establishing you as a shareholder may be used and disclosed for related purposes such as identity verification, providing you with shareholder services, dispatching correspondence and documents to you which are related to your shareholding and responding to complaints or inquiries.
- Personal information collected for the purpose of establishing you as a shareholder may also be used for the purpose marketing of products and services of M2's subsidiaries, such as exclusive shareholder offers.

M2 may use personal information about prospective and current shareholders for the purpose of direct marketing of products and services of its subsidiaries or others. In limited circumstances, direct marketing may occur to former shareholders; for example, where a shareholder has ceased to be a shareholder after the date of dispatch of marketing material. Direct marketing communications may be sent via post and e-mail and will generally accompany correspondence related to a shareholding (such as annual reports). However:

- M2 will not use sensitive information for direct marketing purposes without your consent.
- Unless you have provided consent, or we think it is impracticable to obtain your consent, M2 will not use your personal information for direct marketing purposes where we have obtained the personal information from a third party (other than from M2's share registry), or we have collected it directly from you but believe that you would not reasonably expect the information to be used for direct marketing.
- Whenever we communicate with you for direct marketing purposes, we will give you the opportunity to opt out of receiving further direct marketing communications from M2.
- You may opt out of receiving direct marketing communications from M2 at any time by contacting us at company.secretary@m2.com.au or calling (03) 9923 3000.
- If we use your personal information to facilitate direct marketing by our subsidiaries, you can ask us to provide the source of the information by contacting us at company.secretary@m2.com.au or calling (03) 9923 3000.

Personal information about analysts, journalists and service providers (and their employees, contractors and agents) is used and may be disclosed for the purpose of responding to inquiries and generally managing the relationship with such persons.



M2 may disclose personal information about its shareholders to third parties. For example, depending on the circumstances, M2 may disclose information as set out below:

- To its subsidiaries or other persons where you have expressed an interest in acquiring the products or services of the subsidiary or other person.
- To ASIC in connection with your shareholding.
- To the ASX in connection with your shareholding.
- To M2's share registry in connection with your shareholding.

Personal information may also be disclosed to third party agents and service providers who M2 engages to assist in the performance of its functions and activities. These include:

- organisations that process banking transactions;
- printers, mail distributors, couriers and dispatch centres;
- IT service providers and data managers; and
- legal, accounting, insurance and business advisory consultants services

Personal information M2 obtains in connection with your shareholding may be disclosed in accordance with requirements of the *Corporations Act 2001* (Cth) and the *Australian Securities and Investments Commission Act 2001* (Cth). This includes disclosure:

- to ASIC in connection with M2's obligations relating to unclaimed monies related to your current or past shareholding in M2 or its subsidiaries (such as unclaimed dividends or unclaimed consideration for a compulsory acquisition of shares);
- to persons entitled under the *Corporations Act 2001* (Cth) to inspect or receive copies of M2's books or registers;
- to ASIC, the Australian Federal Police or other enforcement agencies for law enforcement or security purposes or in the course of their investigations; and
- to the ASX if reasonably necessary to respond to inquiries or investigations by the ASX.

M2 may also disclose personal information without consent as authorised by privacy law for a range of other purposes, including:

- where necessary to prevent or lessen a serious threat to health or safety;
- for law enforcement or crime prevention purposes;



- for the investigation of unlawful activity;
- for location of missing persons;
- for use in legal proceedings or dispute resolution.

In situations other than those described above, M2 will not disclose personal information without the customer's consent (although consent may be implied).

Is personal information disclosed outside Australia?

M2 may, in limited circumstances, disclose some personal information to persons or organisations that are outside Australia.

- The customer service and marketing call centre operations of M2's subsidiaries are based in Manila, Philippines. If you have expressed an interest in receiving the products or services of M2's subsidiaries, the Manila based staff of M2's subsidiaries may receive your personal information for the purpose of sales and marketing, customer service, correspondence, provisioning, fault management and technical support activities. The Privacy Policy of M2's relevant subsidiary specifies the policy of M2's subsidiary in respect of the collection, use and disclosure of your personal information.
- Database and webhosting services provided to M2 may involve personal information being transferred to IT service providers based in India, Philippines, Singapore, New Zealand, the United Kingdom, Canada and the United States of America.

How does M2 protect your personal information?

M2 recognises the importance of protecting your personal information and of ensuring that it is complete, accurate, up-to-date and relevant.

When you call M2 in respect of your shareholding or other personal matter, we will verify your identity and to check the details we hold about you are correct and to update them if required.

Our investor relations team, corporate communications team and company secretary are senior members of our team and are aware of the manner in which they are to handle the different types of information they receive, particularly sensitive information.

While some of the personal information we collect is held in hardcopy form, most personal information is stored in electronic databases.

We have extensive processes in place to ensure that our information systems and files are kept secure from unauthorised access and interference. These include:



- System access is controlled by logins and different security levels. Access to shareholder information is only available to our company secretary and investor relations team. Access requests must be supported by a request from the Board of Directors.
- Access authorisation is layered and access authorisations are specific to the job function of each staff member.
- Our employees undergo privacy and information security training on induction and are required to sign acknowledgements of their obligations in relation information security and appropriate use of our IT systems.
- Our contractual arrangements with our share registry and other third parties are designed to ensure that personal information transferred to those parties is afforded appropriate levels of protection.

Can you access or correct personal information M2 holds about you?

You have a right to access personal information we hold about you. If your request is particularly complex or requires detailed searching of our records, there may be a cost to you in order for us to provide you with this information. However, we will not charge you if we are not permitted by law to charge you and if we are allowed to charge you, we will not charge you more than we are permitted by law to charge you. For example, as a shareholder, you are entitled to inspect a register of members without charge.

If you believe there are errors in the information we hold about you, you have a right to ask us to correct the information.

However, we are not required to provide access where we believe doing so would:

- prejudice law enforcement or crime prevention activities;
- pose a serious threat to health or safety;
- have an unreasonable impact on the privacy of other individuals;
- prejudice M2 in legal proceedings or negotiations with you;
- reveal information connected with a commercially sensitive decision making process; or
- be contrary to law.

If you wish to have access to information M2 holds about you, you should contact company.secretary@m2.com.au.



Dealing with M2 on-line

This Privacy Policy also applies to personal information that you email to us, provide by using our website or provide via social media sites.

We store the Internet Protocol (IP) address of your computer when you visit our site. This information is used only to create broad demographic summaries of where our users come from. Our use of these IP addresses, however, does not go so far as to identify the actual users of the site.

We collect personal information about the other websites that are visited by computers that are used to visit our site. This information may be aggregated to provide us with information about the types of webpages and websites, or particular webpages and websites, visited by computers that use our site.

Our website may use cookies and web-beacons. While cookies and web beacons can be used to statistically monitor and analyse the use of our site and to identify information about the computer used to visit our site, we do not use them for that purpose and will not attempt to use them to identify or target individual visitors to our website.

Note that this privacy policy does not apply to, and M2 is not responsible for, the use of, or the protection of information provided to, other websites linked to this website.

Complaints and further information

If you believe your privacy has been interfered with and wish to make a complaint, please contact our Privacy Officer. The Privacy Officer will investigate your complaint and notify you of the outcome.

If it appears from your complaint that there has been an interference with privacy by a person other than M2, the Privacy Officer may discuss the complaint with that person in an attempt to resolve it.

If you are dissatisfied with the outcome of your complaint, or you do not receive a response to your complaint within 30 days, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). Complaints to the OAIC must be made in writing. Where possible, complaints to the OAIC should be made through the online Privacy Complaint form, available at **www.oaic.gov.au/privacy/making-a-privacy-complaint**.

If you would like further information on this Privacy Policy or if you have any concerns over the protection of your personal information, please contact

Attn: Privacy Officer

Email: company.secretary@m2.com.au

Address: PO BOX 631, Collins St West, Melbourne VIC 8007