



Honesty Box Privacy Policy

We're Honesty Box™ (formerly eMetric Pty Ltd) and we provide broadband measurement services nationwide. We're based in Sydney, Australia and our parent company, Enex TestLab Pty Ltd, resides in Melbourne, Australia.

We've created this privacy policy to demonstrate our commitment to ensuring any data we capture from our users or customers is treated securely, confidentially and that we abide by good practice. We've written our policy in accordance with the National Privacy Principles expressed in Australia's Privacy Act 1988 (Cth) but also the General Data Protection Regulations of the European Parliament which came into effect 25 May 2018.

This privacy policy explains why and when we collect your personal information, and what use we make of it. We also explain where and why your information may be disclosed to third parties, and the security measures used to help protect your personal information.

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Why and when we collect your personal information

Honesty Box collects information about our customers and end-users. The information we collect is the personal information required to provide activities or services to you, but it's also used for the ongoing management and support of those services.

Honesty Box only collects information from you where it's necessary for delivery, ongoing management and support of services you have requested.

For end-users, we collect and store personal information you provide to us online or by email, and occasionally via post, face to face, over the phone or through our partners. This information primarily includes your name, physical address, phone number, email address, and technical information such as IP address, your Internet or Retail Service Provider, and attributes from the Honesty Box that is connected to your router.

The most common interaction users have with us today is the Honesty Box physical device that you've agreed to connect to the broadband router in your home. We use this device to quietly measure the performance of your broadband service and this commonly includes measuring attributes such as download and upload speed, latency (ping) and jitter (UDP). We collect some information automatically when you visit www.honestybox.com.au such as your IP address and device type, what pages you look at, and what links you click on. For clarity, we do not, in any circumstances, monitor your private use of Internet services.

As part of our marketing initiatives and efforts to provide improved services, we may collect or develop additional **anonymised** information and associate this with you. This information will reflect the nature of Honesty Box's relationship to you or your organisation.

If you do not wish to receive direct marketing communications from Honesty Box you can opt-out by going to our website or emailing: helpdesk@honestybox.com.au

How we use your personal information

Primarily, we collect and use your personal information to deliver services to you. This includes the provision of broadband measurement services, customer, sales or technical support, billing, customer relationship management, reporting and other relevant functions.

For the broadband performance data we collect from the Honesty Box device, we aggregate and anonymise the data to produce analytics, results and reports, and may share it publicly or with third parties. We currently provide the aggregated anonymised results to CHOICE (www.choice.com.au) and other

partners. CHOICE for example, provides these anonymised results publicly at www.choice.com.au/electronics-and-technology/internet/connecting-to-the-internet/review-and-compare/broadband-performance

Occasionally we may use your information to contact you for marketing purposes, but we commit to ensuring the communications are relevant to our business and you always have the option to opt-out.

The information we collect when you visit our website or mobile site is only for the intention of understanding how you're using our web or mobile site so that we can continue to improve our services and content.

Disclosure of your information to third parties

We deeply respect your privacy and only share personal information with third parties in order to deliver and meet our contractual requirements, or where we may be required to by a law enforcement agency.

In the provision of a core part of our service (broadband measurement) and the quality of that service, we may, from time to time, need to correlate information we hold pertaining to your broadband service, and match with information either nbn™ or your Internet Service Provider holds. In the event we exchange broadband service information, we use secure mechanisms between our company and the third party.

We generally will disclose the data we collect only to employees or research or commercial partners engaged in work which requires access to that data. Before we disclose any data, we confirm appropriate confidentiality protections are in place, and ensure that we only disclose data subsets which have been anonymised. This means we do not disclose any information which could identify an individual.

International data transfer

Our activities are governed by the data protection laws in Australia. We generally do not transfer data that we collect outside Australia, but may provide some anonymised data subsets (that is, data which excludes any personal identifiers) to research or commercial partners, in the UK/EU or USA, from time to time in the normal course of our activities. Before we disclose any data outside Australia, we confirm that equivalent data protection applies.

Where we store information

We store the information we collect from you on secure servers in various locations around Australia. We currently have servers in Sydney, Melbourne and Adelaide. These servers are provided and/or supported by Third Parties, acting under our instruction (learn more at [Disclosure of your information to Third Parties](#)).

How we keep personal data secure

Keeping your personal data secure is our highest priority. We limit access to only those Honesty Box or Enex TestLab (our parent company) employees who have to come into contact with your information to do their jobs and deliver our services.

We have created an organisation-wide security programme designed to keep your personal data as safe as possible. It uses a range of technical, organisational and administrative security measures and best-practice techniques, depending on the type of data being processed. For example, the computer systems we use to store your data have access limitations and in-cloud based servers that use industry-standard disc encryption. We use encryption to protect your personal data when we transfer it across the internet. We also carry out security assessments where relevant, on Third Parties who may handle your data.

We train our staff on data protection and privacy policies. We seek to use the minimum amount of personal data possible, including through use of data minimisation techniques such as anonymisation and pseudonymisation. Also, when we develop or update our services in ways that involve the collection, or use of new forms of personal data, we conduct a privacy impact assessment to analyse and minimise, the likelihood of any unintended impact on your privacy.

Honesty Box has security measures in place to protect against loss, access, use, modification, unauthorised disclosure or other misuse of the information we control.

Our security systems include encryption, authenticated access to internal resources, audits of procedures, and regular reviews of overall security.

Whilst Australian Privacy legislation does not currently require us to report a data breach, the GDPR contains mandatory data breach notification

requirements. In the event of a personal data breach, we commit to notifying the supervising authority within 72 hours of becoming aware of it.

Retention

We retain your personal information for as long as you or your company requires services of us. In the event the relationship ends, we may hold on to your information for a short period of time only. Following that period, we'll make sure it's deleted or anonymised.

Accountability

Under the EU's regulation, we must be able to demonstrate our compliance with the GDPR principles. Firstly, this privacy policy has been written with this in mind and secondly, we have an Incident Response Plan in the event a breach of any kind occurs.

Your rights

It's your personal data and you have certain rights relating to it. You can contact us anytime to:

1. Find out what personal information we hold about you
2. To make sure it's current or correct;
3. To get a copy of this information in a format that is easily usable for you;
4. Request we remove it.

You have an important right to be forgotten so if you no longer have professional relationship with us, you can ask for information about you to be deleted. In all likelihood, we will have removed your personal information, but by all means, please contact us at helpdesk@honestybox.com.au if you would like to confirm this.

If you have questions or would like further information, please contact us at helpdesk@honestybox.com.au