

# Privacy Policy

This Privacy Policy was last updated on 29 May 2025.

This Privacy Policy is to be read in conjunction with the [GreenBe Terms of Use](#) and the Barwon Water [Privacy Policy](#).

This application and website portal (“the Services”) is provided by GreenBe Software (“GreenBe”) on behalf of BARWON REGION WATER CORPORATION (“Barwon Water”). GreenBe and Barwon Water take the privacy of the participants using these online services seriously. The Services include the application, software, services, mobile apps, website and webpages, online platform, and all associated information, content and data provided by GreenBe on behalf of Barwon Water.

GreenBe is an Australian based software company creating software solutions for Water Utilities, Energy Networks and Local Governments to connect and communicate with their customers.

Upon signing up to the Services, all personal information and data you provide is available to GreenBe and Barwon Water.

The collection, use and disclosure of your Personal Information, is regulated by the Information Privacy Principles as defined under the Privacy and Data Protection Act 2014 (Vic) (‘the PDP Act’), by Barwon Water and GreenBe, and are amended from time to time as required.

You can find more information about your privacy rights at the Office of the Victorian Information Commissioner’s website, <http://www.ovic.vic.gov.au> and at the Privacy Commissioner’s website <http://www.privacy.gov.au>.

## Can I remain anonymous?

Ultimately, you have no obligation to use the Services, however the nature of the Services is such that we can only provide the Services with identified individuals.

We are committed to making the experience of accessing the Services a great one for all users and shall always have utmost respect for your personal information and data shared as a part of the Services.

In order to provide a great experience to you when tracking water data, participating in Barwon Water programs, challenge activities, taking questionnaires and surveys, and redeeming rebates, we require some personal data such as your name and email address from you; otherwise we cannot provide challenges and tailored additional ways to earn for being a part of the services.

Whenever we collect and process your data, we will do so with your benefit in mind, by making the customer experience better for you.

## What personal data is collected?

When using the Services, we may ask that you provide us with Personal Information. Personal Information that we might collect may include things such as your name, phone numbers, email address, home address, age. Personal Information may also include other information you supply to us concerning your preferences and interests expressed in the course of using the Services.

## How do the Services use my data?

An example of where we may use or disclose personal information to conduct and improve our business activities is in relation to our installation of digital water meters. Digital water meters allow us to ensure accurate meter reading, help us to detect leaks quickly and identify abnormal water usage patterns. Digital water meter information may therefore be disclosed to property owners, occupiers and contractors or third parties for these purposes (including, for example, to perform network analytics, research and other water or resource saving activities).

The terms "using" and "processing" information, as used in this Privacy Policy, include using cookies or other storage means on a computer or mobile device, subjecting the information to statistical or other analysis and collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organisation.

We collect Personal Information only for the following purposes:

1. to administer the Services
2. to provide, improve and optimise the Services
3. to personalise your customer experience
4. to provide you with software updates and announcements
5. to better understand your individual preferences and program interests
6. to provide you with further information or activities that we believe you may find useful or interesting, such as BARWON REGION WATER CORPORATION based education, surveys, targeted challenges and program around you

We also collect or access non-personally identifiable information when you use the Services, which search terms you used, or which referring/exit pages brought you to our page, device type and date/time information. We may use this information in conjunction with additional non-identifying information that you may provide us when signing up for your Account (for example, your gender or date of birth) to analyse trends through aggregated demographic information about our users generally, and thus, for example, to improve features and functionality of the Services and to make the Services more personalised and relevant to you.

You can change your preference to not receive direct electronic communications by unsubscribing from these messages at any stage.

## Cookies

We may use "cookies" (a cookie is a small data file that is kept in your browser for record-keeping purposes), and/or other storage on your computer or device) to help us collect, maintain, and use this information, for two purposes.

First, to make the interactions easier and more personalised for users, we may utilise persistent cookies to save information relating to your Account and/or activity for future interactions with the Services.

Second, to better understand how you interact with the Services and to monitor aggregate usage by users and web traffic routing on the Services, we utilise session ID cookies to enable certain features of the Services. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Service and then close your browser.

Third party advertisers on the Service may also place or read cookies on your browser. At any time, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit.

Please understand that if you do not accept cookies, you may not be able to use all portions or all functionality of the Services.

## Usage patterns

We may also use data collection tags or directives such as "pixel tags," Javascript scripts, API calls, or similar means (individually or collectively, "Usage Tracking") in combination with cookies and the demographic or psychographic data we have collected, and with third-party analysis partners, to analyse usage patterns of users anonymously and to serve advertisements to you that are tailored based on our analysis of what we believe you would respond favorably to in light of the information that we have collected or accessed about you as described above.

A "pixel tag" is an electronic image, often a single pixel and often transparent, that is placed on a website page and may be associated with cookies on your hard drive. Website usage tracking allows us to count users who have visited certain websites and pages within websites, or used applications or features, to analyse the behaviour of users of the Services, in order to improve the Services and to personalise and determine the effectiveness of promotional or advertising campaigns.

## When do we disclose personal information?

We will not share any such personally identifiable information about you with anyone else, except if we have your permission, or if required by legislation.

We must cooperate with law enforcement agencies to enforce and comply with statutory and/or criminal legislation.

We reserve the right to track IP addresses for the purposes of fraud prevention, and to release IP addresses to government authorities if requested.

We will disclose information about you to government agencies or private parties when we believe reasonably necessary to comply with law, to protect the property and to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, any illegal, unethical or legally actionable activity.

## **How can I change or delete my information?**

You may review, update, correct or delete your Information in your account profile by navigating to the side menu, selecting Edit profile, updating the details and hitting the Save button.

If you completely delete all such information such as a verified email address, then your account may become deactivated. Alternatively, if you would like Barwon Water to delete your Account and/or remove your records from GreenBe's database, please contact [smart-networks@barwonwater.vic.gov.au](mailto:smart-networks@barwonwater.vic.gov.au) or visit <https://forms.office.com/r/A8Ma3E8ua9>.

Once informed of the change, GreenBe will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose and delete your account within 28 days if we do not have any legal obligation to retain the record.

## **Is all my data secure and encrypted?**

We take all reasonable steps to securely store and protect the information we hold from interference, unauthorised use, disclosure, access, modification, loss or misuse. This includes confidentiality requirements for employees and contractors and having in place document storage security, policies, systems and site access restrictions.

We safeguard and help prevent unauthorised access to Personal Information, to maintain data security and ensure we use and disclose the information we collect appropriately. In the event of any unauthorised access to, use or disclosure of your personal information, we will respond in accordance with our obligations under the Information Privacy Principles and the Australian Privacy Principles, relevant guidelines and our internal incident response plan.

Where we hold your personal information in conjunction with the Personal Information of others (e.g. where an account is a joint one), we will allow you to access your own personal information and the joint information (e.g. account balance and transaction details) but not the personal information of other individuals.

We employ administrative and electronic security socket layer (SSL) encryption measures which encrypt, safeguard and protect your information from unauthorised access. In addition, we will delete information after it is no longer useful for providing the Services.

Data will be stored electronically within GreenBe systems, hosted with Microsoft Azure Cloud “[Australia Southeast](#)” region physically located in Victoria.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored personal data to you via email or conspicuous posting on the Services in the most expedient time possible and without unreasonable delay, insofar as consistent with

1. the legitimate needs of law enforcement or
2. any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

## Links to other websites

The Services may contain links or APIs (data or content exchange interfaces), to external services for information or functionality or third-party services. If you choose to visit a participating business or advertiser by "clicking on" or selecting a button, service, banner ad, or other type of advertisement, or click on another third-party link, you will be directed to that third party's resources.

We do not exercise control over third party services, functionality, websites or other resources, including their use of Personal Information, and you should exercise caution when deciding to disclose any Personal Information to a third party. We encourage you to read the privacy policies or statements of the other websites you visit to learn more about their privacy practices.

These other parties may place their own cookies or other files on your computer or device, collect data or solicit personal information from you. Other services follow different rules regarding the use or disclosure of the personal information you submit to them. Our Privacy Policy only applies to the Services and we are not responsible for the privacy practices or the content of other websites.

## Children information

The Services are not for use by persons under 18 years of age. We do not knowingly collect personally identifiable information from children under 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, please contact GreenBe via our [online help desk](#).

If we become aware that a member is under the age of 18 and has provided us with Personal Information without verifiable parental consent, we will delete all information from our servers.

## How to provide feedback

If you would like to make an access request or wish to provide feedback about this Privacy Policy, please contact GreenBe via our [online help desk](#).