Telecommunications Industry Ombudsman

Privacy Policy

Telecommunications Industry Ombudsman Limited

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Who we are

1. Telecommunications Industry Ombudsman Limited (**we**, **us**, **our**, **TIO**) provides a fair, independent, and accessible external dispute resolution service for residential consumers and small businesses who have unresolved complaints about their phone or internet services. We also have a statutory obligation to resolve objections to land access activities proposed by Carriers.

TIO Privacy Policy

2. This policy explains how we collect, use, disclose, and protect your Personal Information. It also explains your rights regarding access to Personal Information we hold about you and what to do if you have a privacy complaint about us.

Guide to words and phrases used in this document

3. This glossary explains the meaning of key terms. We will highlight the use of these terms in our policy by using capital letters.

Australian Privacy Principles	The 13 principles set out in Schedule 1 of the *Privacy Act 1988.*
Carrier	"Carrier" has the meaning given to that term in the *Telecommunications Act 1997.* A carrier is a type of Provider who holds a carrier licence as the owner or operates telecommunications networks and infrastructure.
Decision	Includes: a) choosing to take an action or not take an action; b) doing something (including deliberately doing something, failing to do something, or refusing to do something).
Personal Information	Personal Information has the meaning given to it by the *Privacy Act 1988* and includes Sensitive Information. We outline the types of information we collect in this Policy.
Member	A Provider who is a member of Telecommunications Industry Ombudsman Limited.
Sensitive Information	Sensitive information has the meaning given to it in section 6 of the *Privacy Act 1988.*

Provider	A person or entity involved in the supply of telecommunications services (such as telephone, mobile or internet services) including a person or entity who: a) supplies retail telecommunications services to consumers; or b) is a wholesaler or any other intermediary in the telecommunications services supply chain; or c) is a Carrier.
Third-Party	A person other than you or TIO.

Collection of Personal Information

4. We collect Personal Information we need to perform our functions and activities. Our functions and activities include:
   - handling complaints and resolving disputes about phone and internet services
   - handling land access objections
   - being a voice in the telecommunications industry

   and related business and commercial activities. The Personal Information we collect about you depends on the nature of your dealings with us. You can read more about our functions and activities in our Terms of Reference.

5. We may collect your Personal Information over the telephone (including through voice recording), electronically (including email, surveys and other online channels), by post, from Third-Parties (see paragraph 6), and in person (such as at an outreach event). We may use artificial intelligence (AI) tools and systems to generate or infer Personal Information to perform our functions and activities, we will treat this as the collection of Personal Information and manage this information in accordance with this Privacy Policy.

6. We primarily collect your Personal Information directly from you. Sometimes we may collect your Personal Information from others, including:
   - your authorised representative (if you have one)
   - your Provider, who may give us Personal Information about you to try to resolve your complaint
   - another complaint handling body that had identified we may be able to help resolve your complaint.

If you are a consumer or occupier, or their authorised representative

7. If you are a consumer making a complaint or enquiry to us, we may collect:
   - your contact details, including your name, address, telephone number and email address
   - details about your complaint (such as your telephone number or account number, and details of the issue you want to resolve)
   - the name of your Provider and details of your account, including payment details, invoices and other evidence related to your complaint
   - Personal Information about you that helps us improve our service, such as demographic information
   - Personal Information about you which helps us improve or adjust the accessibility of our service
   - any other Personal Information that is relevant to resolving your complaint.

8. If you are an occupier with a complaint about property damage, we may collect the information in paragraph 7, as well as information about the property and details of the damage.

9. If you are a landowner or occupier with a land access objection (or their representative, or someone we consider may have a legal interest in the land access objection) we collect information (including Personal Information about you) from the Carrier who is proposing to carry out activities on the land. We may also collect Personal Information from you directly while considering your objection. This Personal Information includes details about you and the land you or the party you represent owns or occupies.

10. If you are the authorised representative of a consumer, we collect the Personal Information about you that we need to confirm you are authorised to handle the complaint on the consumer's behalf. We also collect your contact information (such as telephone number, email address, and postal address), so we can contact you about the complaint.

If you represent a Provider

11. The types of information we collect depends on your role and on how the Provider you represent deals with us. We may collect your Personal Information in connection with the performance of your work for a Provider including:
    - your contact information, including your name, telephone number and email address
    - job title
    - information about your role and responsibilities.

12. We collect contact information about employees of Providers to resolve complaints and land access objections, and to conduct our governance, Membership, and financial activities.

13. We also collect information about owners or directors of a Provider for complaint handling, administrative, governance and credit management purposes.

14. We may collect credit information for our finance and credit management activities about a Provider who is a sole trader. This might include Personal Information such as your name and address, court proceedings information, personal insolvency information and credit reports.

If you deal with us in a different capacity

15. We aim to only collect the Personal Information we need to perform our functions and activities. For example, if you deal with us as part of our work with industry, community, and government, or you are a member of the media, we may collect Personal Information from you such as your name and contact details.

16. Visitors to our website can request TIO publications and add their details to our mailing list to receive news about our activities. We collect these details for these purposes only. Our website is hosted in Australia and uses cookies to collect aggregated data about site visitors including limited demographic information. Please see paragraphs 19 to 24 for more information about this.

17. We use social media platforms such as LinkedIn and Meta (which operates Facebook, Instagram and other platforms) to communicate with the public. When you use these services to communicate with us, we will collect your Personal Information you have provided to us when you engage in that communication. Please do not use social media to make or discuss a complaint. If you have a complaint or a question about a complaint, you should contact us directly.

18. We collect your Personal Information if you apply to work with us. We will keep this information for up to six months, for recruitment purposes or for a longer period with your consent. If you want us to delete this information, please contact privacy@tio.com.au.

Website analytics and tracking technologies

19. Our website is hosted in Australia and uses cookies, pixels and similar technologies to collect aggregated data about site visitors to help us understand how our website is used, improve its performance and functionality and enhance the experience of users. Where possible, we use analytics settings designed to limit the collection of information that directly identifies individuals.

20. The technologies we currently use include:

    - **Google Analytics**, which helps us understand how visitors use our website, including which pages are visited and how users interact with website content;
    - **Meta Pixel (Facebook Pixel)**, which helps us understand how users interact with our website and measure the effectiveness of content and communications delivered through Meta platforms, including Facebook and Instagram;
    - **Microsoft Clarity**, which helps us understand how users interact with our online forms and website content by providing insights into user behaviour and website usability; and
    - **PostHog**, which helps us understand how visitors interact with our website and online services, including how website features are used and how users navigate our website, so that we can improve performance, functionality and accessibility.

21. Information may be collected directly by us or through these service providers that assist us with website analytics and performance measurement. These technologies may collect information such as your IP address, device and browser information, pages viewed, links clicked, the date and time of visits, referring websites, and other information about how you use our website and online forms.

22. Information collected through these technologies may be disclosed to the providers of those technologies for the purposes of providing analytics and measurement services. We take reasonable steps to ensure that personal information collected through these technologies is limited to what is reasonably necessary for those purposes.

23. You may be able to control the use of cookies through your browser settings. Disabling cookies may affect the functionality of some parts of our website.

24. Data collected through website analytics and tracking technologies is automatically deleted on a regular basis.

If you do not want us to collect your Personal Information

25. If you are a consumer or occupier making a complaint and you do not want us to collect your Personal Information, we may be unable to handle your complaint. For example, if you have given us insufficient information for your Provider to identify the service your complaint is about, we will not refer your complaint to your Provider.

Use and disclosure of your Personal Information

26. The different ways we use and disclose Personal Information to perform our functions and activities are explained below.

Complaint handling and land access objections

27. To resolve your complaint with us, we need to disclose your Personal Information to your Provider. We may also disclose your Personal Information to other Providers, such as wholesalers or companies related to your Provider. If you are changing Providers, we may need to disclose your Personal Information to both your previous and new Provider.

28. If you represent or work for a Provider we may disclose your Personal Information to a consumer if that Provider can assist us with the consumer's complaint.

29. We will not discuss your complaint with your partner, friends, or family unless they are authorised to handle your complaint on your behalf. You may authorise a representative by completing a third-party representative form which will allow us to discuss your complaint with them.

30. If you are a landowner or occupier (or represent a landowner or occupier) who has objected to a Carrier's land access activity, we may disclose Personal Information about you to the Carrier while considering your objection.

Artificial Intelligence (AI)

31. We may use generative AI technologies and other automated tools built into our approved business systems. AI is used to support TIO employees and improve efficiency but is not used to determine complaint outcomes or make Decisions without human review and oversight.

32. AI tools may assist with activities such as:

- summarising, analysing and organising information;
- reviewing documents;
- identifying themes and trends;
- drafting communications;
- improving accessibility and service delivery;

- to support day-to-day administrative tasks; and
- to support complaint handling processes.

33. TIO may use AI to process personal information that is contained in records and systems accessible to authorised TIO employees. Depending on the task being performed, this may include:

    - contact details;
    - complaint information;
    - correspondence between consumers, providers and TIO;
    - supporting documents provided during complaint handling;
    - service and account information;
    - records held in TIO systems; and
    - information contained in documents, emails and case management records.

34. AI tools may be used to assist with activities that are related to complaint-handling and other operational Decisions, including reviewing information, reporting, identifying issues (including systemic issues), summarising records, highlighting relevant information and assisting staff to prepare communications or undertake further enquiries. These activities support TIO's consideration of complaints and in our industry improvement role. AI outputs are reviewed by TIO employees and are used to assist, rather than replace, the exercise of human judgement.

35. TIO does not use AI outputs or rely on automated Decision-making processes to determine complaint outcomes, dispute resolution outcomes, jurisdictional assessments, privacy complaint determinations, land access objection determinations or other significant Decisions. TIO employees remain responsible for assessing information, exercising judgement and making Decisions.

36. Personal information processed through AI systems may include information generated, inferred or derived from information already held by TIO. Where this occurs, TIO will manage that information in accordance with the *Privacy Act 1988* (Cth) and Australian Privacy Principles.

37. TIO may use technology providers that incorporate artificial intelligence features or services. Some of these systems may process personal information using automated technologies, including artificial intelligence, machine learning, natural language processing, analytics, classification, recommendation or predictive capabilities. These technologies may analyse personal information to identify patterns, trends, insights, similarities or relationships and generate outputs that assist TIO employees in performing operational, administrative and complaint-handling activities. Any such outputs are used as a supporting tool and do not replace human judgement or oversight. Where these providers process personal information on TIO's behalf, TIO takes reasonable steps to ensure the information is protected and handled consistently with Australian privacy requirements.

38. Before introducing new AI systems or significant AI-enabled functionality that involves personal information, TIO will undertake risk and privacy impact assessments, require approval through established governance processes and ensure compliance with internal policies to identify and manage privacy, security, accessibility and consumer impacts.

Member information disclosed on our website

39. We make information about Providers publicly available on our website. This information includes Members':
    - name and trading name
    - postal address
    - customer service phone number
    - web address
    - Carrier licence status.

Disclosure to other bodies

40. We may be authorised or required by law to disclose your Personal Information to bodies such as:
    - the Australian Communications & Media Authority (ACMA)
    - the Australian Competition and Consumer Commission (ACCC)
    - law enforcement agencies
    - the Office of the Australian Information Commissioner (OAIC)
    - the Australian Securities and Investments Commission (ASIC)

41. For example, we may be required to disclose Personal Information to the ACMA under section 522 of the *Telecommunications Act 1997* and the ACCC under section 155 of the *Competition and Consumer Act 2010*.

42. Where we have your consent (or where permitted or required by law), we may also disclose your Personal Information to the bodies listed at paragraph 40, other industry bodies, members of parliament, government departments, or other complaint handling bodies.

Use and disclosure for business activities

43. We may use your Personal Information and disclose it to our service providers in connection with our business and commercial activities. For example:
    - We may use or disclose Personal Information to improve our services by undertaking surveys or contacting you about your experience with us. We may contact consumers and Providers, or we may engage a research organisation to conduct these surveys.
    - We may use or disclose de-identified information about your experiences for advocacy, educational, research, media, public awareness and storytelling purposes,

including in case studies, reports and public communications. We take reasonable steps to ensure that individuals are not reasonably identifiable from this information. If we wish to identify you, or use or disclose your Personal Information in a way that identifies you for any of these purposes, we will seek your consent beforehand.

- We use Personal Information to understand geographic areas or communities we deliver services to. This information helps us better service those areas and communities. Without identifying anyone, we may also use this information to publicise our services and provide reports about those services. We will not publish your Personal Information in connection with these activities.
- We may disclose Personal Information to people and companies who provide services to us, such as lawyers, consultants, contractors, accountants, auditors, and information technology providers. We may disclose Personal Information to these people and companies to improve our services, to ensure compliance with the law, to improve and manage our systems, and for auditing and credit management activities. Where possible Third-Parties will be subject to privacy obligations and may also be subject to the Australian Privacy Principles.

44. We do not use Personal Information for direct marketing. We will not disclose your Personal Information to Third-Parties (including Providers) for direct marketing.

Disclosure of Personal Information overseas

45. We take reasonable steps to ensure overseas recipients of Personal Information are either themselves bound by the Australian Privacy Principles or are contractually obliged to comply with the Australian Privacy Principles. Other than as expressly noted in paragraphs 46 and 48, we do not knowingly send any of your Personal Information outside of Australia.

46. For the disclosures noted in paragraph 43, as at July 2026, no Personal Information is sent overseas by us to any of our service providers. If in future, we do send your Personal Information overseas for any of the purposes listed in paragraph 43, we will comply with the terms of paragraph 45.

47. When we disclose your Personal Information under paragraphs 27 and 30 (including at a Provider's request or to assist in resolving a complaint), we may not know whether the contact details provided by a Provider relate to individuals located overseas. In these circumstances, your Personal Information may be disclosed to recipients outside Australia. Many Providers use staff, agents or third-party contractors located overseas (including in countries such as India, the Philippines, South Africa and New Zealand), and your Personal Information may be disclosed to those recipients for the purposes described above. You should review your Provider's privacy policy to understand how they handle your Personal Information, including whether they are likely to disclose it overseas and to which countries.

48. Some of the third-party service providers we use, including providers of website analytics and measurement services such as Google and Meta, may handle or store personal information outside Australia. We take reasonable steps to ensure that the information is handled in a manner consistent with the Australian Privacy Principles.

How we secure Personal Information

49. We take reasonable steps to protect your Personal Information from misuse, interference, and loss, and from unauthorised access, modification, or disclosure.

50. We hold information physically and in electronic databases and information systems. Information is stored on and off our premises, in archives and databases. Some databases are hosted and managed by Third-Party information technology service providers (for example, cloud services providers).

51. We use all reasonable efforts to secure information collected via our website (including webforms) either by encrypting it or using a private network. However, there is a possibility the information you submit could be observed by a Third-Party in transit. If you would like to use another method to provide us with information, please contact us.

Destruction/deletion of Personal Information

52. When we no longer need your Personal Information and are permitted or required by law to do so, we will securely destroy the information or de-identify it so that you can no longer be reasonably identified.

Making a request or privacy complaint

53. You can:

- request access to Personal Information we hold about you,
- request that we correct your Personal Information,
- make a privacy complaint about how we have handled your Personal Information.

Accessing your Personal Information

54. You can request access to Personal Information we hold about you by speaking to your case manager, calling 1800 062 058, and/or filling out the request to access form or emailing privacy@tio.com.au.

55. Subject to any exemptions permitted by the Privacy Act 1988 we will provide you with a copy of the Personal Information we hold about you. For example, if you are a consumer with a complaint about a Provider, we provide you with a copy of our records about your complaint (subject to paragraph 56).

56. Upon a request for access, we will ask you to verify your identity before we give you access to your information. Your complaint file may contain Personal Information about other people, including the name or phone number of an employee of a Provider. Personal Information about other people will be removed from the records we provide to you to protect their privacy. We may also remove information we received in confidence, or that we are otherwise permitted by law to remove.

57. We will respond to your request for access to your Personal Information within 30 days. We do not charge a fee to make a request. However, if providing access requires significant time or resources (for example, where the request is large or complex), we may require you to contribute to our costs of giving you access.

Correcting your Personal Information

58. You can ask us to correct Personal Information we hold about you by speaking to your case manager, calling 1800 062 058 or emailing privacy@tio.com.au.

59. Upon a request for correction, we will ask you to verify your identity before we make any changes. Where permitted by the *Privacy Act 1988*, we may refuse a request to correct your Personal Information. If we do not correct your Personal Information, we will explain why. If we cannot reasonably correct your Personal Information, we may instead add a statement to your record noting your request for correction.

60. Where appropriate and upon request, we take reasonable steps to de-identify personal information in accordance with Australian Privacy Principle 11. This involves removing or altering information so that individuals are no longer reasonably identifiable.

How to make a privacy complaint

61. If you are not satisfied with how we have handled your Personal Information, or your request to access or correct it, you can make a complaint by emailing your complaint to privacy@tio.com.au or calling 1800 062 058.

62. Please contact us with your privacy complaint before approaching other bodies. We are committed to protecting your privacy and appreciate the opportunity to resolve your privacy complaint.

63. Our Privacy Officer or a member of their team will investigate your complaint. We respond to and investigate privacy complaints within 30 days (or sooner if your complaint is urgent).

64. If you are not satisfied with the outcome of your privacy complaint, you can contact the Office of the Australian Information Commissioner:

Phone	1300 363 992
Email	enquiries@oaic.gov.au
Website	https://www.oaic.gov.au/

Changes to this policy

65. This policy can only be amended by our Board and was last updated in November 2026. When a change is made to this policy, it will be updated on our website. By continuing to use our services or providing us further Personal Information, we assume you have accepted any amendments to the policy.

Contact details

Telecommunications Industry Ombudsman Limited

FREECALL	1800 062 058 (calls from mobiles will be charged at applicable rates)
Interpreter Service	131 450
Website	https://www.tio.com.au/
Postal	PO Box 276, Collins Street West VIC 8007
Email	privacy@tio.com.au