



Privacy Policy

as at 15 May 2018

About AAP

AAP is one of Australia's largest content originators and aggregators. AAP provides impartial and independent breaking news, images, video and digital content to media outlets across the world as well as using its unique position in the media to deliver communications solutions for businesses, government and organisations.

AAP is made up of three key divisions:

- Media Content – AAP Newswire and services
- Media Production – AAP Pagemasters, AAP Megaform and services
- Media Intelligence – AAP Medianet, AAP Directories, AAP Mediaverse.

Introduction

This Privacy Policy applies to Australian Associated Press Pty Limited (**AAP**), including but not limited to its AAP Medianet, AAP Directories and AAP Megaform business divisions and its related companies Mediaverse Pty Ltd and Pagemasters Pty Ltd (collectively, **we, our, us**).

We are committed to protecting and maintaining your privacy and we are bound by the Australian Privacy Principles (**APPs**) and the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy describes the types of personal information we may collect, and how we use, hold and disclose this personal information. It also describes your choices about such collection, use and disclosure.

If you have any questions about our privacy practices, please contact us as set out below.

Privacy standards for journalists

The APPs do not apply to acts or practices engaged in by us in the course of journalism, as we are committed to other journalistic standards dealing with privacy. Accordingly, this Privacy Policy does not apply to personal information collected by our journalists and photographers for the purpose of gathering news. We handle the information we collect in the course of journalism in accordance with the Australian Press Council Privacy Standards, which can be found at <http://www.presscouncil.org.au/privacy-principles>.

What kind of information do we collect and how do we collect it?

The type of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that we need for our business activities, or which you volunteer to us. In general, the type of personal information we collect and hold could include your name, address (postal and email) and other contact details, geographic location, gender, age or date of birth, profession, occupation or job title, and transaction details relating to your use of our products and services. We may collect your personal information via our websites, over the phone, when you write to us, when you attend an event or program run by us or when you participate in a survey, questionnaire, competition or other marketing campaign. More information about the types of personal information we may collect is set out below.

Registration information In order to access some of our services and products, you will be asked to register with us by providing us with certain information about you to create an account.

Activity information This is information about the visits you make to our websites, which we collect using cookies and other technologies. Further information about our use of cookies and how to block them is provided below (see **Cookies and Other Technologies**).

Public information and posts This includes comments and content you post to our online services. This may include your name, user name, comments, likes, tweets, status, profile information and pictures. Public information and posts are available to everyone who views our websites and may be displayed in search engines, even after you cancel an account with us.

Information from third party social media If you connect a service to a third party social media platform such as Facebook or Twitter, we may also collect information from your social media profile. This may include:

- your user name for that third party social media service;
- any information or content you have permitted the social media service to share with us (such as your profile picture, email address followers or friends lists); and
- any other information you have made public via that social media service (including other posts you make using your social media profile).

When you connect a service to your social media profile, you authorise us to collect and handle your personal information in accordance with this Privacy Policy.

Information relating to careers and recruitment This is information you submit to us when applying for a job, cadetship or contract (including freelance work) with us (whether or not such application is solicited by us). This information may include your name and contact details, prior education and experience, referee details and other

information included in your CV or resume. We may collect this information from you, or from recruitment consultants, your previous employers or other references.

Information from other sources This includes information we may obtain from third party companies such as credit reporting agencies, law enforcement agencies and other government entities and information provided to us via networking websites, such as LinkedIn if you are member.

If you choose not to provide us with the personal information we request, this may result in us not being able to:

- provide you certain features of our services;
- provide you with information about products and services that you may want, including information about discounts, sales or special promotions;
- tailor the content of our websites to your preferences, and your experience of our websites may not be as enjoyable or useful; or
- consider you for any existing or future freelance or contract work with us.

How will we use your information?

We will use your personal information for a number of purposes including to:

- personalise services for you;
- update our records and keep your contact details up to date;
- manage your account, process payments and provide you with customer support;
- provide you with access to protected areas of our websites;
- communicate with you by email, postal mail, telephone and/or mobile devices about new products and services that may be of interest to you;
- perform research and data analysis to improve our products and services. Aggregated information will generally be used for this purpose;
- verify your eligibility and deliver prizes in connection with competitions and contests;
- process and respond to any complaint made by you; and
- perform other functions or services as described to you at the time of collection.

To whom may we disclose your information?

We may share personal information with the following third parties:

Third party service and content providers We may make your information available to certain third party service and content providers who help us manage or provide our services or provide us with related services. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes. Our agreements with our third party providers require them to comply with relevant privacy laws. For example, we use third party service providers for cloud services; information technology services; website hosting; telecommunications; mailing services; courier services; payment processing; data entry, data research and

analytics services; call centre services; debt collection; direct marketing services; security services; and professional advisors such as accountants, solicitors, insurance brokers, business advisors, recruitment agents and consultants.

Commercial partners We may also share your information, from time to time, with our partners where we have entered into a commercial arrangement to do so.

On some occasions, personal information collected by us maybe stored, disclosed and processed both in Australian and/or overseas, including but not limited to New Zealand, the UK, the US, the EU, Singapore and Mauritius. In these circumstances, we will use reasonable endeavours to ensure that the foreign entity to which your personal information is transferred has appropriate measures in place to protect your personal information.

Our company affiliates We may share your information with our related companies located in Australia or in other countries, including New Zealand and the UK. If we do, they will use your information in accordance with this Privacy Policy.

Social media providers to allow sharing functionality If you connect your account with a social media profile (if applicable), you authorise us to share your personal information (including your user name, picture, tweets, likes and posts) with that social media service provider, other users of that service and your friends or followers. You understand that the social media service provider may handle this information in accordance with its own privacy policy. If you do not want your personal information shared in this way, please do not connect your social media profile with your account and do not participate in social sharing via our services.

We may share the information we collect about you for the following additional purposes:

To protect our rights and the rights of others We may share your information with other third parties without your consent if the disclosure is, for example:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

To complete a re-organisation merger or sale of assets If we sell all or part of our business or assets, we may disclose your information to the party or parties involved in the sale transaction. We may also do this if we are involved in a merger or transfer of all or a material part of our business.

Careers and recruitment Information you submit to us when applying for a job, cadetship or contract (including freelance work) with us to will be used solely in connection with considering and acting upon your application. We may share this information with third party service providers retained by us to, for example, analyse candidate submissions for job postings.

What marketing communications will you receive?

From time to time, we may send you promotional materials or other information which we think may interest you. For example, we may send you an invitation to participate in various activities, such as customer surveys or special offers. We will only send you emails, SMS, fax and mail or otherwise contact you for marketing purposes where you have agreed to this. Where you have agreed to receive these communications, we may include information about our products and services that we consider may be of interest to you and in accordance with, where possible, the preferences you have indicated.

At any time, if you would prefer to stop receiving newsletters, updates or promotional messages from us, you can change your account settings or follow the “unsubscribe” instructions which we include at the bottom of our emails and text messages. For some of our services, we may deliver notifications to your phone or mobile device. You can disable these notifications by going into “App Settings” on the app or by changing the settings on your mobile device. If you need any help with changing your App settings, please contact us as set out below.

We do not provide your personal information to other organisations for the purposes of direct marketing.

Security and management of your information

We understand that the security of your personal information is important. We take reasonable efforts to use procedures and security features to try to ensure that your personal information is properly protected from misuse or loss, and unauthorised access, modification or disclosure.

System security We store information in electronic databases requiring logins and passwords, and also use computer and network security measures such as firewalls, data encryption and virus detection methods.

Property security We maintain physical security over our paper and electronic data stores, such as locks and security systems. We engage security personnel and use ID cards to control access to our business premises.

Staff training We train our staff to handle your information in accordance with this Privacy Policy and applicable privacy laws.

Third parties We impose strict requirements on all third parties as to how they store, handle and deal with personal information. In all instances, as far as reasonably practicable, we make sure that our relationships with third parties include appropriate protection of your personal information.

Your role You can help us to keep your information secure; please remember that any user name or password in relation to our websites is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

Cookies and other technologies

In some cases, we may collect your personal information through the use of “cookies” on our websites. Cookies are pieces of information that a website transfer to your computer’s hard disk for record-keeping purposes. Cookies, in and of themselves, do not personally identify users, although they do identify a user’s browser. If you then register with us we will retain the information we received from your cookie. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services.

You can control information collected by cookies. You can block or delete cookies by changing your browser settings. Click “help” in the toolbar of most browsers for instructions. You can also contact us for assistance as set out below.

How can you access your information?

You have the right to request access to the personal information we hold about you. If you would like to seek access, please contact us as set out below. We will endeavour to acknowledge your request within 7 days and to provide you with access within 30 days of the date of receipt of your request. We will notify you if we consider it will take longer than 30 days to provide you with access. We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We may also refuse to provide access (for example, if granting access would interfere with the privacy of others or result in a breach of confidentiality). If we refuse your access request, we will provide you with a written notice setting out our reasons for refusing (unless unreasonable to do so) and how you may complain about our refusal.

Changes to your information

We endeavour to ensure that the personal information we hold is accurate, complete and up to date. You have the right to ask us to correct information about you which is inaccurate, incomplete, out of date, not relevant or misleading. We will then consider if the information requires amendment. If we do not agree that there are grounds for amendment, we will make a record noting that you disagree with us. Some of our online services may give registered users the ability to directly access and update certain profile information.

Other important information for you

Third party Sites Our websites may provide links to websites which are controlled by third parties. These may include but are not limited to Facebook, Twitter, LinkedIn and YouTube. Please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you. We recommend that you consult the privacy statements of all third party websites you visit.

Collection of personal financial information by a payment service provider

Sometimes we allow you to use an unaffiliated payment service to purchase a product or make payments for our services (**Payment Service**). If you use a Payment Service, you will be directed to the webpage for that Payment Service. Any information you provide when using a Payment Service may be collected and used by the Payment Service provider in accordance with that provider's privacy policy. You should check the provider's privacy policy to understand how it will handle your information.

Data retention If you close an account you have with us, we may retain certain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, or to maintain systems security. We may also retain your information if required by law, regulation or relevant standards and codes of conduct, or to fulfil our contractual obligations to a third party.

Complaints

If you believe that we have breached the Privacy Act or other applicable privacy laws, please send us a written description of your privacy complaint. We will take all reasonable steps to reply to your complaint. If we take more than 30 days to respond to your complaint, or if you are dissatisfied with our response, you may contact the Office of the Australian Information Commissioner at 1300 363 992 or www.oaic.gov.au.

Changes to this Privacy Policy

We will occasionally need to revise this Privacy Policy, to reflect developments in technologies and information governance practices as well as changes in our business. You should therefore review this page regularly to ensure that you are aware of any changes to its terms. Any updated version of this privacy policy will become effective when we post it on our website.

Contact us

We welcome feedback about privacy issues and will attend to all questions and complaints promptly. You can contact us about any privacy issues as follows:

By email:

privacy@aap.com.au

By mail:

AAP Privacy Officer
Australian Associated Press Pty Limited
PO Box 3411
Rhodes Waterside
Rhodes NSW 2138

This Privacy Policy was last updated on 15 May 2018.