



## Privacy Policy

Southern Cross Austereo Pty Ltd (ACN 109 243 110) (**SCA**) and our related bodies corporate operate a number of commercial radio stations, television stations, websites, and other media platforms throughout Australia, including PodcastOne Australia. In the course of conducting our business we may collect and handle your personal information.

We are committed to the protection of your personal information and meeting the standards set out in the *Privacy Act 1988* (Cth) (**the Act**), including the Australian Privacy Principles (**APPs**). This Privacy Policy sets out how we will handle the personal information that we collect and hold.

## Collection of Information

### What is personal information?

*Personal information* means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether that information is true or not and whether it is recorded in a material form or not.

*Sensitive information* is a subset of personal information that includes information about your race or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, or details of health, disability or sexual activity or orientation. We generally do not ask for sensitive information, but may do so where it is reasonably necessary for our functions and activities and it is permitted or required by law. Generally we will only collect sensitive information where you have consented to our collecting that information, including where you voluntarily submit such information to us.

### What personal information we collect and hold

The personal information we collect about you will depend on the nature of our relationship with you. We may collect:

- your name, address, email, phone number(s) and emergency contact details;
- your age, date of birth, gender;
- payment, credit card and/or bank account details;
- photographs, film and/or audio recordings of you where you attend an SCA affiliated event, attend our premises, call one of our radio or TV stations, or otherwise participate on-air; and
- your interests, opinions about our brands and services, or other information relevant to promotions and activities that SCA runs and to your engagement with SCA, such as information contained in competition entries, job applications, on-air interactions, complaints and enquiries.

We also conduct research surveys for third parties. Where you participate in these surveys we may also collect information about your occupation and salary, your opinions about the brands and services of third parties, as well as sensitive information such as your political opinions or health information. We will only collect your personal information as part of a research survey with your prior consent.

### Why we collect personal information

Generally we collect your personal information to provide you with products or services and to manage our relationship with you.

We also collect personal information for research and marketing purposes and to provide you with information about events, products and services (both our own and those of other companies that may be of interest to you), to improve the services we provide, to run various competitions and trade promotions, and to provide you with payment receipts.

Where lawful and practical, you may deal with us anonymously or use a pseudonym. However in some instances, because of the products and services we provide, if you do not provide us with your personal information we may not be able to provide you with the requested product or service (for example, if we require your details in connection with a competition we are running, we cannot provide you with a prize should you be a prize winner and we cannot contact you).



## How we collect Personal Information

We collect personal information directly from you when you interact with us, for example when:

- you submit an entry into a competition or trade promotion;
- you participate in listener loyalty programs;
- you subscribe to a member database or email newsletter;
- you send us an email, contact us through any of our websites, or post on any of our websites (including any of our social media pages);
- you purchase products or services from us;
- you participate in a research survey;
- you download one of our mobile Apps or stream our products from a website or via a mobile App;
- you call us; or
- you attend an event or activity that we organise, sponsor, or are otherwise affiliated with.

We also have CCTV cameras operating in many of our premises to ensure security and a good working environment for our staff. Premises where CCTV cameras operate have signs at the point of entry, informing you of their operation.

In some circumstances we may obtain personal information about you from third parties such as:

- marketing databases or other sources that are publicly available such as websites, journals, legal directories and phone books;
- friends or relatives who have provided us with your details as part of a promotion, competition or event, including where they have nominated you as an emergency contact; and
- referees or previous employers where you have applied for a job with SCA.

## Website and App Policy

We may also collect anonymous information through the use of cookies on our website. Cookies themselves do not identify users personally but they do allow the tracking of an individual's use of a website. For more information about cookies, see our Website and App Policy.

## Use and disclosure

### Use

How we use your personal information will depend on the nature of our relationship with you. We may use your personal information for the following purposes:

- to provide you with our products or services;
- to manage our relationship with you;
- to administer online and App based services and products and to monitor your activity on these services and products;
- to facilitate the administration of, and your participation in, a trade promotion, competition or other activity;
- to facilitate the administration of, and your participation in, a listener loyalty program;
- to facilitate the administration of, and your participation in, a member database;
- to facilitate the administration of, and your participation in, an online subscription newsletter;
- to monitor your purchase history and our relationship with you;
- to compile listener databases and profiles to enable us to market goods and services more accurately;



- to identify and inform you about other products or services that may be of interest to you;
- to market, improve and add to our products and services including our websites and our radio broadcasts; and
- to report to our third party clients on the results of our research surveys (while personal information is used to compile these reports, only aggregated, de-identified data is given to our clients).

#### **Direct marketing opt out**

If you no longer wish to receive marketing or other communications from us, please contact us on the details below so that we can update your preferences, or follow the instructions in these communications on how to unsubscribe.

#### **Disclosure**

We may disclose personal information to:

- our related bodies corporate;
- third parties engaged by us to provide functions on our behalf (such as storing and managing databases, processing credit card information, mailouts, debt collection, marketing research and advertising), some of which may be located overseas, including in Canada, Singapore and the USA;
- third parties who supply us with content for broadcast and/or industry groups such as Commercial Radio Australia (**CRA**), Free TV Australia or the Advertising Standards Bureau, where you make a complaint about a broadcast;
- regulators and government agencies, such as the Australian Communications and Media Authority (**ACMA**);
- third parties to whom you authorise us to disclose your personal information; and
- our sponsors and promotions partners where you have expressly consented (“opted in”) to being contacted by them.

To protect your privacy, wherever practical we impose contractual requirements of security and confidentiality on third parties as to how they handle personal information that we disclose to them.

#### **Data quality**

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete, relevant and up-to-date.

If you believe that the personal information we hold about you is incorrect or out-of-date, please contact us on the details below so that we can update our records.

#### **Data security**

We store your personal information in a number of secure computer storage facilities and paper based files, and in other records. We may also engage third party service providers to assist in storing and processing certain types of personal information for us, some of which may be located overseas.

We take reasonable steps to ensure that the personal information we hold about you is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

#### **Access and correction**

If you wish to request access to, or correction of any personal information we may hold about you, please contact us on the details below.

Generally, we will provide you with access to your personal information unless one of the exceptions set out in the APPs applies to your request, such as where providing access would unreasonably impact on the privacy of others. If one of these exceptions applies, we may, if reasonable, provide access to the personal information in a way that meets our needs and yours (for example by giving you access through a mutually agreed intermediary), although this will not always be possible.

We may charge a fee for giving access to personal information which reflects our costs of providing access.



**SOUTHERN CROSS AUSTEREO**

*absolutely* engaging

If we refuse your request for access to, or correction of, your personal information, we will provide you with written notification of our decision and our reasons for reaching that decision. If we refuse your request to correct your personal information, you can request that we associate with that information a statement that you believe it to be inaccurate, out-of-date, irrelevant or misleading.

## More information and complaints

For more information on how we handle your personal information, or if you are concerned that we may have breached your privacy and wish to make a complaint, please contact us on the details below.

We will take any privacy complaint seriously, and we aim to resolve all complaints in a timely and efficient manner. We request that you cooperate with us during this process and provide us with relevant information we may require.

We expect our procedures will deal fairly and promptly with your complaint. However, if you are unsatisfied with our response, you can make a complaint to the Office of the Australian Information Commissioner (OAIC) on by calling 1300 363 992 or visiting the OAIC website at [www.oaic.gov.au](http://www.oaic.gov.au).

## Contact us

Mail: The Privacy Officer  
Southern Cross Austereo  
PO Box 345  
South Melbourne, VIC, 3205

Email: [privacy@sca.com.au](mailto:privacy@sca.com.au)

Phone: (03) 9252 1019

## Changes to our Privacy Policy

SCA will review this Privacy Policy from time to time to ensure that it accurately reflects our practices and procedures as well as any changes in the law. We will notify you of any changes to this Policy by posting an amended version on our website ([www.southercrossaustereo.com.au](http://www.southercrossaustereo.com.au)), and changes will take effect from the date of posting.

Last updated: May 2017