

Spooled Media Pty Ltd

Privacy Policy

Version 1.1: 26 December 2018

1. GENERAL

- 1.1. Spooled Media Pty Ltd (ABN 84 630 418 272) ('**us, we, or the Company**') respect the privacy of visitors to our websites ('**Sites**'), our subscribers and other individuals who interact with us.
- 1.2. We have created this privacy policy to explain how we collect, store, use and disclose personal information.
- 1.3. Access to our privacy policy is free. If you would like us to post you a copy of our privacy policy, or have any questions about it or its contents, please email us at info@spooledmagazine.com.au.
- 1.4. The *Privacy Act 1988* (Cth) (Privacy Act) includes thirteen (13) Australian Privacy Principles ('**APPs**'). The APPs regulate the way many companies collect, use, hold and disclose personal information.
- 1.5. We have decided to adopt an approach that is consistent with the Privacy Act, the APP's and the APP guidelines.
- 1.6. Our practices and internal policies are consistent with this privacy policy, and our staff are required to ensure compliance as a condition of their employment. In any third-party contracts, we enter into there is a duty to maintain personal information

following this privacy policy and in a manner consistent with the Privacy Act.

- 1.7. From time to time we will update this privacy policy. If we do so, we will update the version number. Any changes to this privacy policy will be consistent with our legal obligations.

2. HOW AND WHY WE COLLECT PERSONAL INFORMATION

- 2.1. We collect personal information in a number of ways. The most common ways we collect personal information include:
 - 2.1.1. **From application forms (online or hard copy or completed via telephone):** when individuals subscribe to publications, our marketing or communications lists, to provide news, information, offers and other services.
 - 2.1.2. **From competition and promotions:** where individuals provide personal information at the time of entry via the competition or promotion entry form. Personal information is collected to run the competition or promotion, determining and contacting the winner(s) and, unless otherwise noted, to use for direct marketing purposes including to send marketing

communications via electronic means following this policy.

- 2.1.3. **From order forms (online or hard copy or via telephone):** when goods and services are ordered from our advertisers: to fulfil the order and delivering the goods, to provide that information to our advertiser, and to maintain our relationship with the individual concerned.
- 2.1.4. **From telephone, email, written and in-person enquires:** to respond to enquires.
- 2.1.5. **From online or hard copy surveys:** to review and analysing the results and follow up on results.
- 2.1.6. **From public registers including social networks such as LinkedIn:** if you have made this information available, to obtain your contact details.
- 2.1.7. **From Sites through automatic processes such as cookies:** Cookies are used to understand users better and improve the layout and functionality of our Sites by collecting information such as date, time and duration of visits and which pages are most commonly accessed. This tracking is conducted in such a way as to ensure the anonymity of visitors to Sites. While cookies may identify the computer, it should not identify the individual. With

most internet browsers, users can erase cookies from their computer's hard drive, block all cookies or receive a warning before a cookie is stored. However, some parts of this Site may not function fully for users to that disallow cookies.

- 2.2. Our Sites may collect other information that may or may not be personal information. For each visitor to the Site, our server automatically recognises and stores the individual's "IP address" (e.g. the domain name or Internet protocol address), the type of Internet browser being used, the address of the site that "referred" the individual to our website and clickstream data. If this information cannot be used or combined with other data to identify you, it will not be personal information.
- 2.3. We generally collect personal information to provide you with any goods or services that you request, to update our Sites, to improve the services or products that we offer and to develop our business.

3. WHAT PERSONAL INFORMATION IS COLLECTED?

- 3.1. We aim only to collect personal information that is necessary to fulfil the purpose for which you have disclosed it, or as required by law.
- 3.2. You will typically be asked to provide contact information (such as your name, telephone number, postal address and email address). You may

also be asked for demographic information (such as your age and gender) and/or profile data.

- 3.3. In some instances, we may need to ask you for additional information necessary to provide you with the goods or services you have requested. When we ask you for further information in addition to that you provide to us initially, we will tell you why we are collecting that information.

- 3.4. We do not collect sensitive personal information.

4. ELECTRONIC COMMUNICATIONS

- 4.1. In some instances, where you have provided consent, or consent is deemed to have been supplied or conferred (in compliance with the APPs) we may use your personal information to send you marketing communications including by electronic means such as email, SMS, MMS for an unlimited period.
- 4.2. You may opt-out of receiving such messages at any time provided we send such messages. We will give you the opportunity to opt-out within the message that we send to you. You may also opt-out by contacting us (using the details provided below).

5. STORAGE OF PERSONAL INFORMATION

- 5.1. Any information we collect about you will be kept securely by us unless an event beyond our control disrupts the measures we have in place. We use a

range of measures to ensure the security of the data we keep and to prevent unauthorised access, destruction, use, modification or disclosure. We have procedures in place with regards to staff access to personal information and ensure that only those staff who need to know have access to your information.

- 5.2. We will only store personal information for so long as it is required either to fulfil the purpose for which it was collected or to fulfil our obligations at law. We will conduct regular reviews of the personal information we hold and destroy or de-identify information no longer required.

6. DISCLOSURE OF PERSONAL INFORMATION

- 6.1. Generally, personal information will not be disclosed to individuals or organisations outside of the Company without your prior consent. However, in the circumstances described below, personal information may be disclosed to:

- 6.1.1. **Essential service providers:** There may be other companies that we rely on to provide goods or services to you. We may be required to provide your personal information to these companies to ensure that we can deliver products or services to you.
- 6.1.2. **Law enforcement or government bodies:** There are exceptions under the Privacy Act with regards to

the provision of personal information to law enforcement or government bodies. When a legitimate request is sent to us by a law enforcement or government body we will comply with that request and may provide personal information about you without your consent.

- 6.1.3. **Companies related to us or who take control of part or all of our business:** In providing personal information to us you will need to be aware of the possibility that, in future, another company may take control of part or all of our business. In that case, your personal information will be provided to that company.

6.2. If we disclose personal information to a third party under outsourcing or contracting arrangements (a service provider), we will take steps to ensure that they have:

- 6.2.1. Signed a binding agreement;
- 6.2.2. Handle the personal information in a manner consistent with the APPs (regardless of whether they are a small business, or would otherwise be exempt from the Privacy Act);
- 6.2.3. Only use the personal information to provide specific services or to perform the particular functions required; and

6.2.4. Store the personal information securely, and only for as long as is necessary to provide the required services to complete the required functions.

7. ACCESS TO PERSONAL INFORMATION

- 7.1. Under the Privacy Act, you have the right to seek access and to update or correct the personal information that we hold about you. If you wish to exercise your right under the Privacy Act to seek access to the personal information we hold, you should make the request in writing (to the email address below).
- 7.2. Ordinarily, we will not charge for providing access/copies of personal information we hold about you, and will generally respond to access requests of this type within 30 days. If we anticipate there being a fee (for the time we spend locating and compiling the information you have asked for), we will provide you with an estimate before proceeding. If a fee is payable, it will be based on an hourly rate plus the cost of photocopying or other out of pocket expenses.
- 7.3. For legal and administrative reasons, we may also store records containing personal information in archives. Access to these historical records may result in a charge being incurred (an estimate will be provided to you prior). Due to the nature of the archive, requests for access to historical records may take longer to process than with current records.

- 7.4. You may correct the personal information we hold about you at any time; you should make the request in writing (to the address specified below). We do not charge a fee to correct personal information held.
- 7.5. On review of your request, if we agree that the personal information held is not accurate, complete and up to date, it will be corrected by the appropriate person. If we do not agree, you will be provided with the reason(s) for the views and the opportunity to make a statement of your view and have it included with the information held.

8. COMPLAINTS

- 8.1. You have a right to complain to us if you are concerned about your privacy, how we have dealt with your personal information or in relation to the Privacy Act.
- 8.2. If you are concerned about how we have dealt with your personal information you should first contact us (using the details set out below), we will endeavour to send you a written response within ten business days.
- 8.3. If you are not satisfied with the way we have managed or attempted to resolve your complaint you may complain to the Office of the Australian Information Commissioner by calling them on 1300 363 992, via their website at www.oaic.gov.au or by mail to the Office of the Australian

Information Commissioner, GPO Box 5218 Sydney NSW 2001.

9. LINKS TO THIRD-PARTY WEBSITES

- 9.1. Our Sites contain links to third party websites for individual's convenience and information. Individuals should be aware that when they access a third-party website, we are not responsible for the privacy practices or policies of that third party and will not be liable for any use or disclosure your personal information by any third party to whom your information is sent. We suggest that you review the privacy policy of each website you visit.

10. ACCEPTANCE OF THESE TERMS

- 10.1. By using the Sites, you signify your acceptance of this privacy policy. If you do not agree with this policy, please do not use our Sites or provide us with your personal information. The Company reserves the right to modify, alter or otherwise update this policy at any time. Should the Company modify, alter or otherwise update this policy, it will prominently post notice(s) of the changes on the Sites covered by this privacy policy.

11. CONTACT DETAILS

Company Name: Spooled Media Pty Ltd.

Telephone: 0402 294 470

Email: info@spooledmagazine.com.au