

PRIVACY POLICY

Introduction

PLAY Communications Pty Ltd is a GroupM Communications company. GroupM Communications (we, our, us) recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

We respect your rights to privacy under the Privacy Act 1988 (Cth) and we comply with all the Act's requirements in respect of the collection and management of your personal information.

What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to identify you and includes your name, address, telephone number, facsimile number, email address and profession or occupation. If the information we collect identifies you, or your identity can be reasonably ascertained from it, the information will be considered personal information.

What information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- e-mail address;
- telephone contact number;
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- the products and services you have purchased or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites, through our representatives or otherwise; and
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- through your access and use of our website;
- during conversations between you and our representatives;
- when you complete an application.

We may also collect personal information from third parties including from third parties such as credit reporting agencies, law enforcement agencies and other government agencies.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you and to send communications requested by you;
- to answer enquiries, and provide information or advice about existing and new products or services;
- to conduct business processing functions;
- for the administrative, planning, product or service development, quality control and research purposes of this agency, its contractors or service

- providers;
- to provide your personal information to our contractors or service providers;
 - to update our records and keep your contact details up to date;
 - to process and respond to any complaint made by you; and
 - to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy or with prior written consent from the individuals.

To whom may we disclose your information?

We may disclose your personal information to:

- our employees, contractors or service providers for the purposes of operation of our website or our functions, fulfilling requests by you, and to otherwise provide information, products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- to suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (eg. by mailing or emailing it to you). We will not charge you for providing the information to you, or for the costs of making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if we are required or authorised to refuse access under a Commonwealth Act of Parliament. If that happens, we will give you written notice of the reasons for the refusal within 30 days of receipt of your request, together with information about how you can complain about our refusal if you wish to do so.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider whether the information requires amendment. If we do not agree that there are grounds for amendment, we will give you written notice of the reasons for the refusal within 30

days of receipt of your request, together with information about how you can complain about our refusal if you wish to do so.

What is the process for complaining about a breach of privacy?

If you believe that we have breached your privacy, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to our Privacy Officer using the contact details below. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

Do we disclose your personal information to anyone overseas?

We may disclose personal information to third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including our data hosting and other IT service providers located in Singapore, Hong Kong, United Kingdom and United States of America.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

However, as our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us. We also cannot guarantee that the

information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us is transmitted at your own risk.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the Contact link on our website or contact our Privacy Officer via the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer
GroupM Communications Pty Limited
GroupM House
Level 11, 65 Berry Street
North Sydney NSW 2060
Phone: +61 2 8913 1090
Email: lee.bustin@groupm.com

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 1 April 2014.