



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, mobile apps, and other media platforms throughout Australia, including LiSTNR (**Platforms**). In conducting our business we may collect, use, disclose, and otherwise handle your personal information.

We are committed to protecting 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 collect, use, disclose and otherwise handle personal information.

Collection of personal 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 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, month and year of birth, gender; device ID; location;
- 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. When 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, if you do not provide us with your personal information, we might not be able to provide you with some or all of our products and services (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.

Cookies, web beacons and device identifiers

We use cookies, web beacons and device identifiers to understand how users interact with our Platforms, to personalise content, advertise and to improve user experience. Cookies are information stored on your computer's hard disk. Web beacons are tiny graphics that sit on web pages. Device identifiers are set by your mobile phone, tablet, desktop computer, set-top box, smart TV or other digital hardware.

Cookies, web beacons and device identifiers allow us to collect certain information including your IP address or other unique identifiers for the devices you use to access our Platforms (such as mobile phones, tablets, and desktop computers) and to track how your interaction with the pages and content on our Platforms.

Most web-browsers are set to accept cookies, but you can set your web-browser to refuse cookies. If you reject cookies, you will not be able to use some of the functionality on our Platforms.

Technologies

We have implemented several technologies such as Google Analytics, Salesforce Marketing Cloud, Krux DMP, Chartable and survey and promotion management tools on our Platforms to collect data related to the demographics and interests of visitors to our Platforms.

By collecting this data, we can analyse how visitors engage with our Platforms, so that we can improve our online offerings for our audiences.

You can opt out of the Google Analytics' Demographics and Interest Reporting tool by clicking [here](#).

To learn more about the Chartable analytics tool, click [here](#).

Some of our Platforms also use Nielsen proprietary measurement software, which allows you to contribute to market research and audience ratings services. We cannot identify you from this information. To learn more about this software and your choices in relation to it, please click [here](#).

Our use and disclosure of personal information

Use of personal information

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 administration of, and your participation in, a trade promotion, competition or other activity;
- to facilitate administration of, and your participation in, a listener loyalty program;
- to facilitate administration of, and your participation in, a member database;
- to facilitate 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 products 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 Platforms and our broadcast and digital products and services; and
- to report to our 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).

Disclosure of personal information

We may disclose your 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, the Philippines and the USA;
- third parties who supply us with content for broadcast or digital distribution and industry groups such as Commercial Radio Australia (**CRA**), Free TV Australia and Ad Standards (which reviews complaints about advertising);
- 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.

protect your privacy, wherever practical we impose contractual obligations of security and confidentiality on third parties to whom we disclose your personal information.

Social Media Advertisements

We may use social media platforms to deliver advertisements to our subscribers on these platforms. Your email address is converted to a unique “hashed” number that is matched with another unique number to identify you within the social media platform.

Direct marketing opt-out

If we have collected your Personal Information, we provide opt-out or unsubscribe links on all our direct marketing communications including email unsubscribe links or SMS opt-out links. If you no longer wish to receive direct marketing or other communications from us entirely, please contact us using our details below so that we can update our records.

Advertising

We deliver targeted behavioural advertising on our Platforms to better serve your browsing activities and interests.

You can opt out of personalised advertising in several ways. Most web-browsers are set to accept cookies, but you can set your web-browser to refuse cookies and web beacons. If you refuse cookies or web beacons you might not be able to use some of the functionality on our Platforms. We also use third party applications to assist in providing you with targeted advertising based on your online activities.

You can opt out of web-based advertising by clicking [here](#), [here](#) or [here](#). Additionally, you can follow instructions to restrict personalised advertising on Apple or Android devices.

Opting out of personalised advertising does not mean you will no longer receive advertising, just that the advertisements you see will not be based on your online activities.

Other ways we handle personal information

Data quality

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

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

Data security

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.

We store your personal information in secure computer storage facilities and paper based files, and in other records. We engage third party service providers to assist in storing and processing certain types of personal information for us. Some of these service providers may be located overseas, including in Canada, Singapore, the Philippines and the USA.

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.

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.

App account and subscription account deletion

If you close your account or ask us to close your account on any of the free or subscription-based services on our Platforms, we will delete or anonymise your personal information so it no longer identifies you, unless we're required to keep or use your personal information for a legally justifiable reason. For example, we are required to maintain records to comply with legal, tax, audit and accounting obligations, and for dispute resolution purposes.

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**) by calling 1300 363 992 or visiting the OAIC website at 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

Phone: (03) 9252 1019

Changes to our Privacy Policy

We review this Privacy Policy from time to time to ensure 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.southerncrossaustereo.com.au), and changes will take effect from the date of posting.

Last updated: 3 September 2024