ABC PRIVACY POLICY



Updated: 12 March 2014

The ABC is strongly committed to protecting your privacy when you interact with us, our content, products and services.

Our goal is to provide you and your family with media experiences that inform, entertain and educate. Sometimes this means that we use information that you provide to us about yourself to customise that experience. We do this to improve your enjoyment of our products and services. In providing our services to you, the ABC will be transparent about how and why we collect and use your information. In some cases, if you do not want us to collect or use your information in a particular way, then we will give you the opportunity to say so.

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy
- the kind of information the ABC may collect about you, how we collect it, and how we use it
- how we may disclose that information
- · how you can access the information we hold about you
- when we may use your information to contact you
- the protection of your personal information
- the ABC's use of cookies to collect information, and how you can control or delete these cookies
- additional steps to protect young people
- how and why we collect and use additional information when you visit the ABC Shop.

1. APPLICATION OF THIS PRIVACY POLICY

The ABC's Privacy Policy applies to personal information collected by the ABC, whether we have asked for the information or not. The ABC is governed by the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth).

The APPs do not apply to acts done, or practices engaged in, by the ABC in relation to its program material. In most cases, such acts and practices are governed by the ABC Editorial Policies and ABC Code of Practice rather than this Privacy Policy.

This policy applies only to the ABC. It does not apply to any other company or organisation, including those whose digital services have links to ABC content or services. Third party services which have links to ABC content or services will govern

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the use of personal information you submit to them, which may also be collected by cookies when you visit or use them. We do not accept any responsibility or liability for the privacy practices of such third party digital services.

This policy applies to ABC Shops. The ABC Shop is a multichannel retailer with stores Australia-wide, and includes online shopping at www.abcshop.com.au.

The ABC will review this policy regularly, and may update it from time to time. If we make changes, we will post those changes on the <u>privacy page</u> of the ABC's website.

2. COLLECTION AND USE OF PERSONAL INFORMATION

2.1 Why we collect personal information

The ABC collects personal information about you:

- because you have provided it to us, for instance if you contact us to make comments, complaints or to ask us questions, or you have interacted with one of our digital services (including online and mobile services), for instance by participating in forums, polls or competitions;
- because we need it to provide a product or service that you have requested, for instance, if you subscribe to an email list or loyalty program, enter a competition, or purchase products from the ABC;
- because we would like to improve our services, for instance through the collection and analysis of statistical and research data and use of cookies (see below);
- because you work for us, or apply to us for a job, a cadetship or work experience;
- for purposes directly related to any of the above.

2.2 How we collect information when you use a digital service (including online and mobile services)

Broadly, there are two types of information or data we collect:

Information that you specifically give us

For example, you may provide information about yourself when you are filling in a form or when you sign up to a service. This type of information may include your name, email address and age. The information that you give us may be:

 Personal information that is required. In some instances, you must provide personal information if you wish to use a particular service or participate in an activity. For example, your age may be required if we need to confirm Some personal information that you provide is completely up to you. For instance, you can choose to 'like' an ABC TV program on its Facebook page, or not.

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that you are old enough to use a particular service.

• Personal information that is optional. You may choose to provide some personal information which is not required but is directly related to the ABC's functions or activities. Usually this type of information will enable the ABC to improve or broaden the services we can offer you. If you choose not to provide this optional information, we would still be able to offer you the service, but perhaps with fewer options than if you had provided the optional information. For example, if you tell us your interests in a particular area, we may be able to provide you with specific ABC content that matches your interests. If you provide us with unsolicited information that we do not require or which is not directly related to the ABC's functions or activities, the ABC may be required to destroy or de-identify that information, provided it is lawful and reasonable to do so.

Permissions. Sometimes you will be asked to confirm that you agree to a
particular activity. For example, you may need to expressly agree that you
would like to receive a newsletter or to confirm that you agree to the terms
and conditions of a competition.

You may be able to make changes to the information you provided us (for example, if you change your email address) or withdraw the permission you gave us for a particular service. We will make it clear how you do that.

Data we collect that tracks your activity

When you're 'surfing the net', we collect information about the ABC pages that you visit. This helps us identify what our audiences are most interested in.

The ABC automatically gathers information to monitor the use of its digital services (including online and mobile services), like the numbers and frequency of visitors to ABC websites.

This information helps us improve our services by learning what our audiences use and don't use. It can also help us identify if there are any problems with our services that need fixing.

This data is usually collected using 'cookies'. 'Cookies' are small files that are stored on your

browser. Further information about the ABC's use of cookies is provided below.

Most of the data we collect is aggregated, and this information is effectively anonymous to us.

In some cases we may collect data that can be linked to you individually. For example, when you log in to an ABC digital service as a registered user, we may store records of information such as the comments you make, the pages you viewed or links you click on. Similarly, if you use our email newsletters we may collect data about the mailings you open and the links you click on from that newsletter.

As well as helping to improve our services, we may use this data to provide recommendations that you might find helpful based on your activity. In some cases, a digital profile may be formed based on your activity. We do this in order to improve your experience (for instance, because some services may allow you to build a profile which earns different privileges); or to improve our ability to provide a service

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(for instance, because our decisions about moderation of content may need to have regard to your profile).

Though surveys usually collect aggregate data, we will make it clear to you if any survey information is being collected in a way that could personally identify you.

If you use ABC Shops, further information may need to be collected because of the commercial nature of this site. Additional privacy information about ABC Shops is set out below.

3. DISCLOSURE OF PERSONAL INFORMATION

3.1 Disclosure of personal information to third parties

The ABC may disclose your personal information to third parties for the following purposes:

- to provide the service you wish to use;
- for research purposes relating to the performance, quality, maintenance and improvement of the ABC's services and products;
- to customise and promote ABC services which may be of interest to you;
- to provide technical support to you to use the ABC's services;
- · if permitted or required by law; or
- otherwise with your consent.

The ABC is assisted by a variety of third parties to deliver the services offered by the ABC. These third parties are too numerous to list, and they change from time to time. Some examples of the types of third parties include:

- technology service providers including:
 - Internet service providers such as Akamai
 - App service providers such as Wildfire
 - cloud service providers such as Engine Yard and Amazon Web Services
- ABC Shop fulfilment partners such as Australia Post
- Promotion or marketing service providers such as Mindbox and Double Click
- Subscription service providers and their mailing houses.

In many cases, the ABC imposes contractual restrictions equivalent to those imposed on the ABC under the Privacy Act in respect of collection and use of personal information by those third parties. In some cases, such as social media networks, the ABC's ability to impose contractual restrictions is limited. In those circumstances, the ABC will carefully consider the risks to the protection of personal information when entering into arrangements with third parties.

These third parties may be located in Australia or overseas locations, including but not limited to Singapore and the USA.

The ABC may disclose your personal information (excluding sensitive information about you) to third parties for the purposes of direct marketing the ABC's services. The ABC will obtain your specific consent to disclose sensitive information for the

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purposes of direct marketing the ABC's services. You will be able to opt-out of direct marketing at any time if you so choose.

Under no circumstances will the ABC sell or receive payment for licensing or disclosing your personal information.

3.2 Information that you disclose publicly

The ABC provides content and services on a range of platforms with interactive features that you can contribute to. These include: guestbooks, forums, event diaries, reviews, recipes, online voting, blogs, and comments on opinion articles.

When using digital services (including online and mobile services), we suggest that you use your discretion and exercise caution when providing your personal information. For instance, if you "share" information that you have posted on an ABC website using a social media tool, it is likely that you will be sharing your personal information. The ABC has a limited capacity to protect personal information that you choose to share in this way.

Note that whenever you post personal information in publicly accessible places, such as chat rooms or message boards, this information becomes available to anyone with access to the internet. This information can be collected and used by others. In short, if you post personal information (such as your contact details) online, you may receive unwanted messages from other parties in return. Therefore, we recommend that you refrain from posting any

Some ABC programs (such as Q&A) invite you to participate via Twitter. You should be aware that when you do this, you may be sharing personal information, including your political views.

information that you do not want seen in these public areas. For example, when participating in an ABC forum or guest book, your name will appear on the message board. In some cases, it may be appropriate to use a pen name or pseudonym rather than your real name when you are online. You must not intentionally use the name of another living person.

Ultimately, you are responsible for maintaining the secrecy of your passwords and/or any personal information. Be responsible whenever you are online or using a digital service.

3.3 Information that is disclosed via other platforms or services

Some ABC services may be integrated with external services, including social media networks. This may mean that information, for instance about your interests and activities, is tracked or pulled from other places (such as Facebook). If you are signed in to an ABC service which is integrated with other media tools, this information may be available to others depending on the privacy settings you have in place on other platforms.

The number and nature of social media platforms is changing rapidly, and the way in which information is shared between them is becoming increasingly complex. To help you manage and protect your personal information, the ABC will ask you to opt-in

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before making your personal information available through an integrated service. You may also opt-out of your participation in most of the ABC's digital services. Information about how to opt-out will be provided in the particular service. However, you should be aware that the ABC may continue to store personal information provided by you prior to you opting-out.

Your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party.

4. ACCESSING YOUR PERSONAL INFORMATION

You have the right to request access to personal information that is held by the ABC about you. Requests for access will be dealt with by the ABC in accordance with the *Freedom of Information Act* 1982.

You also have the right to request the correction of any of your personal information that the ABC holds. The ABC will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. To seek access to, or correction of, your personal information please contact the ABC as follows:

By email: privacy.abc@abc.net.au

By telephone: (02) 8333 5316

By mail: ABC Privacy Contact Officer

Australian Broadcasting Corporation

GPO Box 9994

Your State or Territory

5. USE OF YOUR PERSONAL INFORMATION TO CONTACT YOU

We will never knowingly send you unsolicited commercial electronic messages. More information on the Spam Act 2003 is available from the regulator's website: www.acma.gov.au/spam

We may use information that we know about your likes and interests to tell you about other ABC programs, products and services when you are online. We may know about your likes and interests because you have provided that information, for instance via a social media platform, or because we have inferred this based on your browsing history, or other data related to your behaviour on ABC digital services.

6. PROTECTION OF YOUR PERSONAL INFORMATION

The ABC will take all reasonable and practicable steps to ensure that your personal information is properly protected from misuse or loss, and unauthorised access, modification or disclosure.

At the same time, we are committed to providing innovative and interactive experiences, and to being available to audiences on multiple platforms. Some of

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those platforms are not operated or controlled by the ABC, and our ability to protect your personal information is limited.

We encourage you to be vigilant about the protection of your own personal information when using third party digital services (such as social media platforms). As far as reasonably practicable, we will make sure that our relationships with those third parties include appropriate protection of your privacy.

7. USE OF COOKIES ACROSS OUR DIGITAL SERVICES

The ABC uses a "cookie" system on its digital services. A "cookie" is a small data file placed on your machine or device which lets our digital service store information. This information allows us to make our digital services easier to use and more relevant.

The ABC uses cookies for interactive features such as forums, voting, some games and online shopping at the ABC Shop website. For instance, cookies allow our servers to keep track of your customer details between visits to the ABC Shop website. The information stored by the cookie includes data that is provided during online registration processes. Placing cookies on your device also means we can serve you promotional information that you might be more interested in. The promotional information can appear on third party digital services as well as ABC digital services. It also allows us to control the number of times you see that promotional information and measure how effective the campaign has been.

Credit card information is never stored in a cookie.

The analytics systems used by the ABC use cookies to gather information regarding visitor activity on the ABC's digital services. This is not used to identify personal details but is collated into aggregate results in order to evaluate and improve our services. When you use the ABC's digital services, some information is logged automatically, such as your computer's operating system, Internet Protocol (IP) address, access times, browser type, pages visited and videos viewed. The ABC engages independent measurement companies (such as Webtrends and Nielsen Online) to perform these services. Privacy information from Webtrends is available here. Nielsen Online provides its privacy information here.

7.1 Controlling and deleting cookies

Popular browsers will usually give users a level of control over cookies.

You can set your browsers to accept or reject all, or certain, cookies. You can also set your browser to prompt you each time a cookie is offered.

Most cookies are easy to delete, and the Help function within your browser should tell you how. Some digital services may not load properly or function as intended if cookies are disabled, however it is up to you to determine the balance of convenience and computer privacy that you are comfortable with.

7.2 Cookies used by the ABC

The ABC uses the following types of cookies:

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Session Computer Browser Cookies - Session cookies let you move from page to page without the need to repeatedly sign in. For instance, these cookies are used by the ABC Shop website to keep track of things such as what you put in your shopping cart. A session browser cookie is stored in the browser and deleted when the browser shuts down.

Persistent Cookies - Persistent cookies are used to help us monitor the performance of our digital services by recording your browsing behaviour within the particular digital service.

These browser cookies can only be read by the company that places the cookies on the computer. Persistent cookies are saved to the hard drive until they expire. Unlike session browser cookies, they are not deleted when the browser is shut down.

Flash Cookies – also known as Local Shared Objects, are used to track activity in Applications that are running in Adobe Flash Player. Designed for usability, they allow user's custom settings to persist between visits.

The ABC uses web beacons in combination with cookies to track activity. Turning off a browser's cookies will prevent web beacons from tracking activity.

7.3 Third Party Cookies

The ABC uses a number of suppliers who also set cookies on our digital services on our behalf in order to deliver the services that they are providing.

For instance, if we embed photos and video content from third parties such as flickr and youTube, those third parties may have set cookies relating to that content. If you then "share" that content, another third party cookie may be set by the service you have chosen to share content through. The ABC does not control these cookies, and does not block cookies set by third parties in these ways.

8. ADDITIONAL INFORMATION FOR PARENTS AND YOUNG PEOPLE

Some digital services provided by the ABC are specifically designed for children; ABC4Kids for pre-school children and ABC3 for older children. The online protection of children is a shared responsibility between the ABC, the parent or carer, and the child. We strongly encourage parents and carers to monitor and participate in their children's use of the ABC's digital services.

The ABC aims to ensure that children and young people who engage with our online spaces understand the possible risks they face and how to minimise them. ABC digital spaces designed for children are subject to House Rules which guide participation and are designed to maintain safe and appropriate behaviour. House Rules include restrictions on the types of personal information the ABC allows children to communicate publicly. Content submitted to ABC children's sites is largely pre-moderated in order to enforce the House Rules and protect children.

If your child is participating in online community activities, we recommend you read the House Rules for that space with your child and explain anything to them that they may not understand. ABC PRIVACY POLICY Page **9** of **10**

9. ADDITIONAL INFORMATION ABOUT ABC SHOPS

In addition to the General Principles outlined above, the following information is relevant to the ABC Shop.

9.1 Collecting information about you

We collect personal information about you:

- to manage and deliver orders that you make now and in the future
- so we have a record of your order should you wish to return or exchange an item at a later date
- to contact you with offers specific to your order
- if you send us a query
- if you subscribe to an email list
- with your permission, to advise you of ABC Shop special promotions
- as part of an entry to a competition or product review
- to run cookies on our website (see above)
- as part of our customer database
- for statistical and research purposes
- for purposes directly related to all of the above.

The ABC automatically collects general website traffic information (such as how many people have visited the site, most popular pages etc). This information is collated into aggregate results in order to evaluate our service and business practice in an effort to provide you with an optimum shopping service.

9.2 Disclosure of information

We may share non-personal, aggregated information with other ABC Divisions, our partners and product distributors for research purposes. We never identify or disclose individual customers or visitors' information or purchases but we may disclose how many customers bought a specific item or used a specific service.

We may disclose personal information to third parties as set out above.

9.3 Access to your personal information

Personal information that you have provided to ABC Shop (such as your name, invoice and delivery addresses, phone number, or email address) is accessible by registering with ABC Shop. By registering with ABC Shop you will need to retain a username and password. The ABC recommends that you update your personal information if your details change so that our records are accurate, complete and upto-date.

9.4 Credit card information

Crucially, your credit card details are only stored and transmitted in encrypted form. Unencrypted credit card information is NOT stored on our internet servers. Online credit card payments are currently processed using a third party payment gateway service run by Direct Payment Solutions LTD (DPS). DPS provides a PCI-DSS (plastic card industry data security scheme) compliant payment gateway service to

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the ABC Shop that is used to securely process customer payments. For more information, you can read the <u>DPS Privacy Policy</u>. Credit card information is never stored in a cookie.

If you use PayPal to complete your transaction, your personal information (including credit card information) will be collected and used by PayPal. For more information, you can read the PayPal Privacy Policy.

If you use your credit card and the transaction is manual rather than electronic, the imprinted record will be stored by the ABC Shop for the period that financial records are required to be retained.

9.5 Your Choice – Online or Offline Shopping

If you do not wish to place your order on the internet, we offer you the option of phoning, faxing or mailing in your order.

The ABC Shop Customer Order Centre GPO Box 9994 Sydney NSW 2001

Phone: 1300 360 111 [+61 2 8333 5668] Fax: 1300 360 150 [+61 2 8333 5622]

Australia

10. PRIVACY COMPLAINTS AND ENQUIRIES

The ABC welcomes feedback about privacy issues and will attend to all questions and complaints promptly.

You can contact the ABC about any privacy issues as follows:

By email: privacy.abc@abc.net.au

By telephone: (02) 8333 5316

By mail: ABC Privacy Contact Officer

Australian Broadcasting Corporation

GPO Box 9994

Your State or Territory

If the ABC takes more than 30 days to respond to your privacy complaint, or if you are dissatisfied with the outcome, you can make a complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner. The OAIC can be contacted on 1300 363 992 or at www.oaic.gov.au

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