



This policy outlines how Star News Group uses and manages personal information provided to or collected by it with respect to readers, customers, advertisers and other individuals with whom Star News Group has contact. This policy has been reviewed and modified to meet Star News Group's obligations under amendments to the Privacy Act 1988 that came into effect on 12 March 2014.

Star News Group may, from time to time, review and update this Privacy Policy, particularly to take account of new laws and technology, changes to Star News Group's operations and practices and to ensure it remains appropriate to the organisation and the community.

Individual privacy is important to Star News Group and we aim at all times to handle information responsibly. As a media organisation, we handle a very large quantity of personal information and it is critical to the quality of our operation and our position in the community that this information is handled appropriately.

# Australian Privacy Principles

The Privacy Amendment (Enhancing Privacy Protection) Act 2012 includes a set of new, harmonised, privacy principles that regulate the handling of personal information by both Australian government agencies and businesses.

These new principles are called the Australian Privacy Principles (APPs) which have replaced the Information Privacy Principles (IPPs) that applied to Australian Government agencies and the National Privacy Principles (NPPs) that applied to businesses. Under the changes, there are now thirteen new APPs.

The information in this policy sets out in general terms how we comply with the requirements of the Privacy Act 1988 and how information should be handled by Star News Group and refers to some specific situations. Where a particular situation is not covered by this policy, please refer to the <u>Australian Privacy Principles Fact Sheet</u> issued by the Office of the Australian Information Commissioner.

Our Privacy Policy describes our practices in connection with information collected through our services including postal subscriptions, digital subscriptions, advertising services, websites, mobile sites, applications (apps), competitions and surveys. By using these services you agree to the terms and conditions of this Privacy Policy.

This Privacy Policy applies to all individuals who interact with us, including those who are advertisers, subscribers to our products and services and registered or unregistered users of our services.

# Open and Transparent Management of Personal Information

Star News Group will ensure we manage your personal information in an open and transparent way at all times. We do collect personal information, for example your name, contact number and email address.

We collect personal information to provide you with the products and services you request as well as information on other products and services offered by or through us.

Personal information may be used and disclosed to external organisations that may include international organisations that help us provide our specialised products and services. These organisations are bound by strict confidentiality arrangements.

You may seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please advise us so that we can correct it. Star News Group, upon your request, and subject to applicable privacy laws, may provide you with access to your personal information that is held by us.

We may collect non-personal information about how people use our website. This information will include website activity (such as the number of users who visit our website, the number of pages viewed, how users have accessed our sites (ie. from a search engine or a link). This information provides us with statistics that can be used to analyse and improve our websites.

Star News Group is committed to working with its customers and readers. If you have any concerns about privacy please advise us so that we are given the opportunity to improve our processes. You can write to us outlining your concerns addressed to the:

The Privacy Officer Star News Group PO Box 9 PAKENHAM VIC 3810

# Anonymity and Pseudonymity

Star News Group will provide individuals with the option of not identifying themselves or using a pseudonym when dealing with us, such as in contact from readers, unless it is unlawful or impractical to do so.

If you choose to transact with Star News Group anonymously, you will be advised of the significance of doing so; for example any complaints or concerns may not be able to be actioned.

# Information We Collect

Star News Group will only collect personal information which is reasonably necessary for our business functions and activities. Information will be collected in a way which is lawful, fair and not unreasonably intrusive. Star News Group will disclose certain information at the time of or before collecting personal information.

The types of personal information that we may collect about you will depend on our relationship with you.

Personal information collected may include:

- Your name, address, gender, date of birth, phone contact numbers and email address;
- Payment details (such as bank account, credit card or PayPal details), to create an
  account, become a subscriber or an advertiser in connection with the purchase of our
  products and services.

### Use, Collection and Disclosure of Personal Information

Star News Group may use personal information provided by you to ensure that it continues to provide customers, advertisers and readers with the best possible products and services and to address any questions you may have about our products and services.

We may collect information about you when you:

- use our services or purchase our products;
- fill in a new customer account form;
- enter into an advertising contract;
- deal with us over the telephone;
- email us;
- have contact with us in person;
- register or subscribe to be part of any of our digital products
- engage in social media through any of our platforms ie. Facebook, Twitter or Apps;
- enter into one of our competitions;
- visit our websites;
- provide us with feedback or complete one of our surveys; or
- otherwise interact with us.

As well as collecting information directly from you, there may be occasions when we collect information about you from a third party. These third parties may include:

- third parties that run competitions and other promotions for us or for which we are the sponsor;
- access or log-in to a third party social media service to post comments (information collected may include your user name, comments, likes, tweets, status, profile information and picture(s). Public information, posts and comments are always public and are available to everyone and may be displayed in search results on search engines.

Star News Group may use your personal information for the following purposes:

- to provide you with our products and services;
- measure and improve our products and services
- to organise marketing or promotional activities for both our print and online digital products and services;
- to deliver our newsletters and any other campaigns, promotions and events;
- to allow service and content providers, including website hosting service providers, data cloud services and debt collection services who support us in delivering and managing our services;
- to publish a letter to the editor, a social media post or a comment, we may publish your name and suburb to identify you as the author of the letter, the post or the comment;
- to allow social sharing; if you log in with or connect a social media service account with Star News Group, we may share your user name, picture, tweets, likes or comments with other Star News Group users and with your friends associated with your social media service.

Star News Group may not use or disclose your personal information for a purpose other than the primary purpose for which it was collected, except only:

- where you have consented to the use and disclosure of the information; or
- where the purpose is related to the primary purpose for which the information was collected, and it would have been reasonable to expect to use or disclose that the information for the secondary purpose would be used in that way; or
- where it is required or authorised by or under an Australian law or a court/tribunal order;
- where it will prevent or lessen a serious and imminent threat to somebody's health; or
- where the information is used for direct marketing purposes; (subject to certain conditions).

# **Direct Marketing**

From time to time we may use the personal information we collect from you to identify particular Star News Group products and services which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. We will only do this with your consent and we will always give you a choice to opt out of receiving such information in the future.

Where we use your personal information to send you marketing information by email (or other electronic means) or by post, we may do so with your implied consent or if this is impracticable, we will ensure that you are provided with an opportunity to "unsubscribe" or "opt out" from receiving future communications. By not choosing a clearly displayed option to "opt out", we will assume we have your implied consent to receive similar marketing communications in the future.

Where direct marketing takes place by telephone, a member of our call centre team will enquire whether you wish to opt out of receiving any further contact from us.

Personal information (other than sensitive information) that Star News Group collects about you will not be shared for direct marketing purposes to potential advertisers and any other individuals to whom Star News Group may provide a service to unless:

- we have collected information from you; and you would reasonably expect Star News Group to use or disclose information for that purpose; and
- we have provided a simple means by which you may easily choose to 'opt out' and not receive direct marketing communications from us; and
- you have not made such a request to Star News Group.

Star News Group maintains a register of individuals or businesses who have elected to not receive further direct marketing contact. This register will be referred to upon you contacting us to ensure individuals or businesses are not contacted.

# **Cross-Border Disclosure of Personal Information**

Personal information may be used and disclosed to external organisations, that may include international organisations, that help us provide and manage our specialised products and services.

These trusted organisations must handle any information confidentially and are bound contractually to not disclose any information. Currently, the countries in which our service providers are located in are the Philippines and Canada.

Star News Group takes steps to ensure that all our service providers protect the privacy and security of any personal information transferred outside of Australia at all times.

# Adoption, Use or Disclosure with Government Agencies

Star News Group will not share personal information about you with other government agencies without your permission except in the following situations:

- where it is necessary to provide you with a service that you have requested;
- where you have specifically authorised in writing that the information may be provided to the third party. Where this disclosure has been authorised, Star News Group will keep a copy of the authorisation.
- where it is required or authorised by or under an Australian law or a court/tribunal order;
- where it will prevent or lessen a serious and imminent threat to somebody's health;
- where it is reasonably necessary for Star News Group to verify your identity for the purposes of Star News Group's activities or functions; or
- where it is reasonably necessary for Star News Group to fulfil its obligations to an agency or a State or Territory authority; or
- where the information is provided to a third party for a purpose connected to the primary purpose for which the information was collected, including:
  - · to recovery agents for the purposes of enforcing unpaid accounts;
  - to a distribution agent for the purposes of responding to a reader complaint.

- where the information is required to be provided for other purposes including the following:
  - to a legal practitioner for the purposes of conducting legal proceedings;
  - where the information is required by a court order to be disclosed;
  - where the information is required by the police or other agency for the purposes of investigating a crime.

#### Security of Personal Information

Star News Group will take all reasonable steps to prevent information from being misused, lost and from unauthorised access, modification or disclosure. Information which is no longer needed will be destroyed or de-identified.

### Security of On-Line Information

Star News Group takes the security of any information held on-line seriously. We have systems in place to ensure our on-line products and services are as secure as your dealings with us in person, or on the telephone.

When purchasing our products ie. 'Star Photos' we use the standard encryption, Secured Socket Layer (SSL). The URL in your browser will change to 'HTTPS' instead of "HTTP' when this security feature is enabled and your browser may also display a lock symbol on its bottom taskbar to indicate this security feature is activated.

Except for authorised law enforcement entities, no other attempts are made to identify individual users or their usage habits. Unauthorised misuse of information stored in our systems will be investigated and may result in criminal prosecution.

We may collect non-personal information about how people use our websites. This information will include website activity (such as the number of users who visit our websites, the number of pages viewed, how users have access our sites (ie. from a search engine or a link). This information provides us with statistics that can be used to analyse and improve our web sites.

A 'cookie' is a packet of information that allows a server (the computer that houses the website) to identify and interact more effectively with your computer.

When you use one of our websites we send you a temporary cookie that gives you a unique identification number. A different identification number is sent each time you use one of our websites. Cookies do not identify individual users, although they do identify a user's browser type and your Internet service provider (ISP).

Most browsers automatically accept cookies, however, you can configure your Internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your browser instructions or help screen to learn more about these functions.

Search terms that you enter when using our search engine are collected, but are not associated with any other information that we collect. We use these search terms for the purpose of aggregated statistical analysis so we can ascertain what our customers and readers are looking for on our websites and to improve the services that we provide.

### Access to Personal Information

You may request access to personal information about you that we hold. Where the information requested is routine (for example about contact details), then both the request and the provision of information may occur verbally or in whatever form is most convenient to expedite the provision of information.

Where the information requested is lengthy, complex or time-consuming for Star News Group to provide, a request must be made in writing. Star News Group will deal with your request to provide access to your personal information in a reasonable time; usually within 30 days of receipt of your request. The written request must specify the particular information sought with sufficient details to enable the information to be located.

Whilst we will not charge you for lodging such a request, we may recover from you our reasonable costs incurred in supplying you with access to this information. We will inform you at the time of the request of an estimate of the administrative charge and may require that you provide a deposit not exceeding the estimated administrative charge prior to providing the information.

Your right to access your personal information is not absolute. In certain circumstances, the law permits us to refuse your request to provide you with access to your personal information, such as circumstances where:

- access would provide a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of other individuals;
- the request is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings and would not be required to be disclosed in the course of those proceedings
- the information relates to ongoing negotiations between Independent and the individual or business and would prejudice those negotiations;
- access would be unlawful;
- denying access is required or authorised by law;
- the information is relevant to an investigation of a criminal offence;
- the information relates to a commercially sensitive decision-making process.

Where a request for access to information may fall into one of these categories, Star News Group will require that the request be made in writing with appropriate details to enable Star News Group to identify the requested information.

Where we deny access to provide the information after a request, we will inform you of our decision within a reasonable period of time and will outline the reasons for denying access to the information.

# **Quality and Correction of Personal Information**

It is inevitable that some personal information which we hold will become out of date. Star News Group and its representatives will take all reasonable steps to ensure that processes for the correction of personal information held by Star News Group is accurate, up to date, complete and relevant upon your request to correct the information.

### Maintaining of Personal Information

Star News Group is required to keep a record of personal information only as long as is necessary or required by law. Where an individual or business has on-going contact with Star News Group, relevant information and records will be maintained. Where any individual or business has ceased to transact with Star News Group, information will be retained for a reasonable period as required by law.

Information held by Star News Group will be subject to regular review and assessment as to whether it is necessary that Star News Group maintain a record of the information.

### Call Centre Monitoring

Star News Group may monitor and record inbound calls to our Classifieds Call Centre for training purposes. If you do not wish your call to be recorded for training purposes, please let one of our call centre team members know at the time of your call.

#### Sensitive Information

Sensitive information will only be collected where you have consented to the collection of personal information or that the collection of personal information is required for legal, safety or public policy reasons.

Where information is provided in an unsolicited form, Star News Group will treat such information with the utmost sensitivity and confidentiality. We know that when you give us your personal information, it imposes a serious responsibility upon us. We are committed to protecting your personal information and maintaining your trust.

If it is not necessary for Star News Group to retain the information, it will be destroyed. If it is necessary for Star News Group to keep a record of the information, it will only be accessible by those who require access to the information.

### Information Collected in the Course of Journalism

Information collected in the course of journalism is handled differently from the information that Star News Group collects for other purposes.

Star News Group is committed to the highest standards of information management and has pledged to handle information this type according to the standards of the <u>Australian Press</u> <u>Council's Statements of Principles</u> and <u>Charter for Free Press</u>.

#### **Privacy Statement**

As soon as practicable at or before the time of collecting personal information, Star News Group will make available and/or refer you to our Privacy Statement.

This Privacy Policy is published on our website in order to meet our obligations under the new Australian Privacy Principles in the way that we collect, use and disclose personal information.

Your use of Star News Group's website constitutes an acknowledgement that you have been made aware of our Privacy Policy.

# **Privacy Complaints**

If you have a concern about your privacy or you have any query on how your personal information is collected or used please contact us using the details below. We will respond to your query or complaint within a reasonable time.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner.

### **Contact Us about Privacy and Information Handling Practices**

Where any aspect of this policy is unclear or where a situation arises which is not addressed by this policy, the matter will be referred to the managing director for further consideration or determination.

Star News Group is committed to working with its customers and readers. If you have any concerns about your privacy please advise us so that we are given the opportunity to improve our processes.

Phone: 03 5945 0666

Email: <u>starnewsgroup@starnewsgroup.com.au</u>

Write: The Privacy Officer Star News Group PO Box 9 PAKENHAM VIC 3810

You can also obtain further general information about your privacy rights and privacy law from the Office of the Australian Information Commissioner.

Phone: 1300 363 992

Email: <u>enquiries@oaic.gov.au</u>

Write: GPO Box 5218 SYDNEY NSW 2001

Website: <u>www.oaic.gov.au</u>