

Universal Music Australia Privacy Policy

This policy explains how Universal Music Australia Pty Limited and its Australian related companies (collectively, "UMA" or "we") manage personal information and comply with their obligations under the Australian *Privacy Act 1988* (including the Australian Privacy Principles set out in that Act).

The policy applies to all personal information that UMA collects, uses, discloses, stores and handles, including personal information collected through our network of websites (umusic.com.au, getmusic.com.au, theinsong.com, artist websites managed by UMA, and any other site that links to this policy) and via social media platforms (such as Facebook, Twitter, YouTube, Instagram, Pinterest and Google+).

In this policy, "personal information" means information or opinion about an identified individual, or an individual who is reasonably identifiable.

What kinds of personal information does UMA collect?

UMA is one of Australia's largest producers and distributors of music products and other entertainment goods and services. We collect personal information so that we can provide our goods and services, and information about those goods and services, to customers, fans and other interested parties.

The kinds of personal information we collect will depend on the purpose(s) for which we're collecting it, but may include the following:

- Your name.
- Your contact details, such as an email address. If you're purchasing any of our goods or services, we may also need your postal address and a phone number.
- Your age or date of birth, where this is relevant to the particular purpose of collection (for example, because some of our goods and services may not be appropriate for children).
- Your entertainment preferences (for example, the music or artists you like).
- The details of any specific goods or services you've browsed, purchased or requested.

You can always refuse to give UMA any of the personal information we request, but that may mean we can't provide you with some or all of the goods or services you require.

How does UMA collect personal information?

We generally collect personal information directly from the individual concerned.

Sometimes we collect personal information from a third party, for example if we are running a competition or promotion jointly with another company, or if we're fulfilling an order for goods or services placed via a third party. In these cases, we will ensure the third party has made the individual aware that their information will be passed on to UMA.

We may collect personal information about you from a social media platform when you use it to register or login at any of the UMA websites, but you will be given the opportunity to authorise this at the time you register. For example, if you use your Facebook profile to register with a UMA website, you will be asked to confirm that you are happy to share

information from your profile with UMA. Where you give UMA access to one of your social media profiles in this way, we will only collect information that you have made publicly available, including:

- your name;
- your email address;
- your location;
- your gender;
- your date of birth; and
- your "likes", "shares" and public posts.

We may also collect personal information from a third party where particular circumstances require it, for example if we need to obtain a reference from a previous employer prior to offering an individual a job at UMA.

What are the purposes for which UMA collects personal information?

The primary purpose for UMA's collection of personal information will usually be obvious from the context in which it's collected, or it will be explained at the time of collection.

The most common examples are set out below.

- We collect your personal information when you sign up to receive information, news or offers from UMA, or become a member of a club we run, for example when you sign up to receive email newsletters from a particular artist or about a particular kind of music.
- We collect personal information when you enter a competition or participate in another form of promotion run by UMA (either alone or in conjunction with another company). In these cases, we will use your personal information for the purposes of running the competition and contacting the winner(s). We may also send you information, news and offers about our goods and services (and, if applicable, those of the other company) unless you tell us at the time that you do not wish to receive that material. You can also opt-out of receiving this kind of material at any later time using the facility provided in each email communication, or by contacting UMA in the manner described at the end of this policy.
- We collect your personal information when you place an order for any of our goods or services (for example, CDs, music downloads or merchandise purchased from getmusic.com.au). In this case, we will use your personal information for the purposes of fulfilling your order and delivering the requested goods or services, and for related purposes such as account management.
- We collect personal information from our artists and their agents/managers for the purposes of maintaining our relationship with them and fulfilling our contractual obligations and responsibilities.
- We collect personal information from job applicants so we can review and assess their applications.
- We also collect personal information in order to respond to individuals who make inquiries of UMA by email, telephone, letter or in person.
- Finally, we collect personal information about individuals who we deal with in a business context, including suppliers, distributors, licensees, retailers and brand partners. We only use this information for purposes related to the business relationship(s) we have with the individual and the company they work for.

How does UMA use personal information?

We generally use personal information only for the purpose(s) for which we collected it, or for related purposes. Some of those related purposes include managing our relationship with the individual concerned, communicating more effectively with the individual, and evaluating and improving our goods and services (including our websites and social media pages).

If you have given us consent, we may also use your personal information to send you information, news and offers about our artists, goods and services, for example new music releases, upcoming tours or product launches. From time to time, we may also provide you with information about third party goods or services that are connected with a UMA artist, for example merchandise or ringtones. You can opt-out of receiving this kind of information at any time using the facility provided in each email communication, or by contacting UMA in the manner described at the end of this policy.

Apart from the uses described above, we will only use your personal information for purposes that are permitted by law (including under the Privacy Act).

Who else do we give personal information to?

We will only disclose your personal information to individuals and organisations outside UMA in the limited circumstances described below, or if we have your consent or we are legally required or permitted to disclose the information.

We will never share your personal information with third parties for the purposes of them marketing their goods and services to you unless you have specifically opted-in to receive marketing material of this kind (for example, you have ticked a box on a competition or promotion entry form).

Artists and their management

Where an artist and/or its management company have entered into an agreement with UMA to have access to personal information we collect about fans of the artist, we may allow them access to that personal information. However, we will not do so unless they have confirmed to us that they will handle that information in accordance with the Privacy Act and the Australian Privacy Principles.

Should UMA and the artist part company, they may directly contact you with future marketing. You should refer to their privacy policy for further information about how they will handle your personal information, or about how to opt-out of future communications from them.

Third-party service providers

UMA engages a range of third parties to provide services and perform business support functions for us. Some of those third parties need access to personal information in order to provide the services or perform the functions UMA requires. Where we share your personal information with third-party service providers, they will be contractually bound to use and disclose the information only for the purposes of providing the services or performing the functions required by UMA, and to store the information securely.

Some of the third-party service providers we use are located outside of Australia, so we may need to transfer personal information to the countries in which they are based. Those countries include the USA, UK, France, India and the Philippines.

Sharing of personal information with Universal Music group companies in other countries

As UMA is part of the worldwide Universal Music group of companies, we may from time to time transfer personal information to a local Universal Music company located in another country. We will only do this where it is necessary or appropriate to achieve the purposes set out in this policy (for example, because that Universal Music company is responsible for providing systems or services to other group companies like UMA), or it is otherwise made known to you at the time the personal information is collected.

If a user located in another country signs up and opts in to receive information and promotions from UMA, we may transfer their personal information to the local Universal Music company located in their country, and that company may contact the user with relevant information and promotions. You will be given the opportunity to opt-out of those local communications on any email you receive from them.

Please note that where UMA transfers personal information to a Universal Music company located outside of Australia, we will take steps to ensure that the information is only used for purposes permitted under this policy, and is given the same protection as it has here in Australia. No matter where your information is processed, this privacy policy will remain in effect.

Universal Music group companies operate in all major countries of the world, including the USA, the UK, France, Germany and other European countries, New Zealand, China, India and other Asia-Pacific countries, and in other regions such as the Middle East and South America. The Universal Music companies that host systems and data (including personal information) on behalf of UMA and other group companies are located in the USA, UK and France.

Credit management

If you purchase any of our goods or services for on-sale, UMA and/or its distribution agent may use and disclose personal information (including to credit reporting bodies) for credit-related purposes such as checking credit-worthiness, credit reporting, fraud checking, collection activity and registration of security interests on the Personal Property Securities Register. If we disclose your personal information to credit reporting bodies, you acknowledge that this information may be recorded on any credit information file that the body may maintain about you.

Where applicable, we will only use and disclose your personal credit information in the manner permitted by Part IIIA of the Privacy Act.

Further information about how we use personal information for credit management purposes is provided on our Account Application form.

Cookies and other technologies

UMA websites collect other information that may or may not be personal information. Each time you visit a UMA website, its server automatically recognises and stores your "address" (e.g. your domain name or internet protocol address), the type of internet browser you are using, the address of the site that "referred" you to the UMA website and "clickstream data" (i.e. data about the way you're interacting with the website, including what you're clicking on).

In addition, UMA uses "cookies" to collect data about the usage of our websites. A cookie is a small text file that is placed on your computer, smartphone or other internet-enabled device. Most web browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt or refuse cookies. Please note that rejecting cookies may mean that not all the functions on the UMA websites you visit will be available to you.

UMA uses cookies to personalise your browsing experience (by remembering your preferences and recognising you as a repeat visitor to our websites), and to track statistics about the usage of our websites. This allows UMA to better understand its users and improve the layout and functionality of its websites. This tracking is conducted in such a way as to ensure the anonymity of visitors to UMA websites. While the cookie may identify your computer, it should not identify you unless you are registered with the website or logged in using your social media profile. In that case, the cookie will be linked to your profile so that we can identify you and provide more relevant content.

To try and bring you offers that are of interest to you, UMA has relationships with other companies that they allow to place advertisements on their web pages. If you visit a UMA website, advertisement server companies may collect information such as your domain type, your IP address and clickstream data.

UMA also uses Google Analytics to gather statistical information on how users interact with our websites. For more information about how Google protects your privacy, see <http://www.google.com/analytics/learn/privacy.html>.

Links to other websites

Sometimes UMA websites contain links to third-party websites for your convenience and information. You should be aware that when you access a non-UMA website, we are not responsible for the privacy practices or policies of that site. We recommend that you review the privacy policy of each site you visit, especially if you intend to provide any personal information via the site.

Storage and security of personal information

UMA takes reasonable steps to protect the personal information we hold and control against risks such as loss, misuse and interference, or unauthorised access, modification or disclosure. These steps include the use of firewalls, restricted access to databases and systems containing personal information, secure servers, and industry-standard encryption of credit card transactions. UMA only allows authorised personnel to access personal information to the extent necessary to perform their duties, and it is a condition of employment with UMA that its employees maintain the confidentiality and security of personal information.

Please note that UMA cannot guarantee the security of online transactions and communications sent by electronic means or post, in particular where any personal information is transmitted over the internet. Any such communication is therefore sent at your own risk.

Where we have given you (or you have chosen) a username and/or password that enables you to access a UMA website, you are responsible for keeping them confidential. You should not share that information with anyone else.

Accessing and correcting your personal information

Under the Privacy Act, you generally have a right to seek access to personal information that UMA holds about you. You also generally have a right to ask UMA to correct personal information about you that you think is inaccurate, out of date, incomplete, irrelevant or misleading.

If you wish to seek access to the personal information UMA holds about you, please make a request in writing to our Privacy Officer (contact details are set out at the end of this policy). Your request should state whether you are seeking access to all the personal information UMA holds about you or to particular personal information (in which case you should specify that in your request). You should also provide some form of identification (e.g. a photocopy of your driver's licence or passport) so UMA can verify that you are the person to whom the personal information relates. You should also include details of how UMA can contact you in case we need to discuss your request. If you need more information before making a formal request for access, please contact the Privacy Officer, who can explain how UMA will handle your access request and assist you in making that request.

UMA will assume (unless you tell us otherwise) that your request relates to UMA's current records about you. These current records will include personal information about you which is included in our databases and in paper files, and which may be used by UMA on a day to day basis. To provide you with access to current personal information, UMA will ordinarily provide you with a print-out of the relevant personal information from its databases, or with photocopies of records which are held only on paper files. If personal information about you (e.g. your name and address details) is duplicated across different databases, we will generally provide you with only one printout of this information. Ordinarily, UMA will not charge you for the cost of providing this type of access to its records, and it will generally respond to access requests of this type within 30 days of receiving your request.

For legal and administrative reasons, UMA may also store records containing personal information in its archives. You may seek access to the records held by UMA which are not current records, but if you do so, we may charge you for the cost we incur in providing access. It may also take UMA longer to respond to your request. Please contact the Privacy Officer to discuss your requirements.

If you think that any of the personal information UMA holds about you is inaccurate, out of date, incomplete, irrelevant or misleading, please provide our Privacy Officer with a written request for correction (contact details are set out at the end of the policy). It is UMA's policy to consider and respond to any requests for correction within 30 days of receiving the request.

If UMA agrees that your personal information is inaccurate, out of date, incomplete, irrelevant or misleading, UMA will correct it for you. If we do not agree with your view, we will provide you with reasons for our view, and will provide you with an opportunity to make a statement of your view and have it included with the information.

How to make a complaint

If you believe that we have breached this policy, or any of the Australian Privacy Principles in the Privacy Act, then you should make a complaint to UMA in the first instance. You should address your complaint in writing to our Privacy Officer (contact details are set out below), and you should include as much detail as you can about the personal information affected, and the circumstances that you believe amount to a breach of this policy or the APPs.

We will undertake an internal investigation, and we may contact you if we need to obtain any further information in relation to your complaint. We will generally provide a written response to your complaint within 30 days. Our response will set out the results of our investigation, including whether we agree that UMA has breached this policy or the APPs.

If you are unhappy with our response to your complaint, you have the right to make a complaint to the Office of the Australian Information Commissioner. Details of how to contact the OAIC are provided on its website at www.oaic.gov.au.

Contacting UMA

If you have any questions about UMA's handling of personal information, or if you wish to make an access or correction request or complaint, you should contact the UMA Privacy Officer by one of the following methods:

By telephone: 02 9207 0500 (from outside Australia +61 2 9207 0500)

By email: uma.privacy@umusic.com

By post: Privacy Officer
Universal Music Australia
25 Hickson Road
Millers Point NSW 2000
Australia

General

This policy was last updated on 12 March 2014.

UMA may make changes to this privacy policy from time to time, but we will not change the way we use personal information you have provided to us previously without your consent.

You can find more information about privacy and the protection of your personal information on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.