

PRIVACY POLICY

Universal Music Australia Pty Limited (“UMA” or “we”) respects the privacy of the individuals it deals with, and is committed to complying fully with its obligations under the National Privacy Principles (“NPPs”), which are contained in the Privacy Act 1988 (“Privacy Act”). The NPPs govern how organisations like UMA handle personal information. “Personal information” is information or opinion about an individual that identifies the individual, or from which it is reasonably possible to determine the individual’s identity.

This Policy outlines the types of personal information UMA collects and explains how it collects, uses, discloses and holds that information. The Policy also explains how you can gain access to personal information that UMA holds about you and provides contact details for UMA. Finally, the Policy sets out the way UMA handles personal information online (i.e. on the internet) and how UMA uses and discloses personal information that it collects about individuals it deals with in the context of its business activities and relationships (our “business contacts”).

This privacy policy applies to all websites currently owned or operated by UMA including, but not limited to, the UMusic Website (“UMA Websites”).

1. How is Personal Information Used?

UMA is one of Australia’s largest producers and distributors of entertainment goods and services. For the purposes of this Policy, these are referred to as “our goods and/or services”.

The primary purpose for which UMA collects personal information is so that we can provide you with our goods or services and provide you with information in relation to our goods or services. UMA also uses your personal information for purposes incidental to these purposes including, without limitation, for the purpose of managing its relationship with you, communicating with you effectively and identifying which of our goods and services may interest you in the future, and if you consent, by providing you with special offers and newsletters related to the UMA Websites, artists or other promotions as the case may be.

UMA does not collect information it does not need. For example, UMA does not collect sensitive information (such as information about your health or political beliefs) because it does not need it in order to provide you with our goods or services.

2. What Personal Information does UMA Collect?

If you ask UMA to provide you with our goods or services (including signing up to join one of its clubs or mailing lists, submitting a competition entry form, applying for a job or choosing to receive promotional information), UMA may ask you to provide your name and contact details such as telephone number, postal address and email address. UMA may also ask you for additional information including, but not limited to, your age and entertainment preferences (e.g. what type of music you prefer).

You can refuse to provide UMA with the personal information that it requests from you. However, if you do not provide UMA with the personal information it requests, UMA may not be able to provide you with our goods or services.

If at any time you do not wish to be notified about goods, services or promotions offered by UMA, or if you do not wish to receive any further communications from UMA, you can opt-out of any, or all, UMA communications by directly contacting UMA. Details of how to contact UMA are set out in section 10 below.

3. How does UMA Collect Personal Information?

UMA collects personal information in a number of different ways. The most common ways in which UMA collects personal information, and the purposes for which that information is collected, are as follows:

Personal information is collected from artists and their agents, for the purpose of maintaining UMA’s relationship with those individuals and performing its contractual obligations and responsibilities.

Personal information is collected from application forms (including on UMA websites) when individuals apply to receive information, news and offers from UMA or become members of clubs run by UMA. This information is collected for the purpose of providing news, information, offers and other services to members.

Personal information is collected from competition entries and other promotions, for the purpose of running the competition or promotion and contacting the winner(s), and, if entrants/applicants do not tell UMA otherwise, for the purpose of sending information, news and offers in relation to our goods and services.

Personal information is collected from job applications (including on UMA websites) when individuals apply for jobs at UMA. This information is collected for the purpose of reviewing and assessing the individual’s job application.

Personal information is collected from order forms when UMA’s goods and services are ordered by distributors and retailers, for the purpose of fulfilling the order and delivering the goods, and to maintain its relationship with the individual concerned. Personal information collected in this context may include credit, charge or debit card details. If you provide this additional credit information it will only be used for the purposes of purchasing our goods or services.

Personal information is collected from online order forms when UMA’s goods or services are ordered by individuals, for the purpose of fulfilling the order and delivering the goods, and to maintain its relationship with the individual concerned. Personal information collected in this context may include credit, charge or debit card details.

Personal information is collected from telephone, email, written and in-person enquiries directed to UMA, for the purpose of responding to the enquiries.

Personal information is collected from UMA's business contacts, including from contracts and business cards, when they enter into transactions with UMA or otherwise interact with UMA in a business context.

Personal information may be collected from UMA websites through automatic processes such as cookies, as discussed in section 9 below.

The remainder of this Policy focuses particularly on how UMA handles personal information about individuals who are consumers of our goods and services or who visit UMA websites. However, as noted above, UMA also handles information about people who do not fall within these categories:

UMA handles personal information about artists (e.g. musicians, actors, directors, software programmers and graphic designers) whose work is published and/or distributed by the UMA. Except where the Policy says otherwise, this personal information is generally handled in the same way as the personal information of consumers.

UMA also handles personal information about its business contacts (e.g. its suppliers, distributors and retailers). How UMA handles the personal information of its business contacts is discussed in section 8 below.

4. Will Personal Information be Given to Anyone Else?

Generally, UMA will not disclose personal information to individuals or organisations outside UMA without your consent. However, in the circumstances described below, personal information may be disclosed outside UMA.

(a) Outsourcing

From time to time, UMA may provide information to other companies within the Universal Group that perform certain functions on its behalf. Any personal information transferred between Universal Group companies in such circumstances will be handled in accordance with the NPP's and this Privacy Policy. UMA may also disclose personal information to third parties to whom it contracts out specialised functions (e.g. mailing houses, printing companies and event organisers). For example, when UMA conducts a promotion, it may enter into a contractual arrangement with a mailing house, which will be subject to a contractual obligation to distribute on UMA's behalf information about its products, services or promotions. If UMA does disclose personal information to third party contractors under outsourcing or contracting arrangements, UMA will take steps to ensure that those contractors:

(i) handle your personal information consistently with the NPPs (regardless of whether they are a small business, or would otherwise be exempt from the Privacy Act);

(ii) only use your personal information in order to provide the specific services or to perform the specific functions required by UMA; and

(iii) store your personal information securely, and only for as long as is necessary to provide the required services or perform the required functions.

(b) Disclosures required or permitted by law

UMA may also disclose personal information to individuals, corporations, organisations or government authorities without your consent if it is required to do so by law, or if the disclosure is permitted under the Privacy Act.

(c) Disclosures to credit providers and credit-reporting agencies

If you purchase our goods or services, UMA may disclose personal information to credit providers for credit related purposes such as credit-worthiness, credit rating, credit-reporting and fraud-checking. If we disclose your personal information to credit providers you acknowledge that this information may be recorded on the credit information file that the external credit provider may maintain about you.

(d) Transfer of personal information overseas

From time to time UMA transfers personal information to overseas companies, both in the Universal Group and externally. For example, this may occur in the course of booking overseas tours for artists contracted to UMA, or when we store personal information about customers, club members and competition entrants on servers that are hosted by a Universal Group or an external offshore company.

If UMA does transfer your personal information overseas, we will take steps to ensure your personal information is given the same privacy protection in the destination country as it receives here in Australia.

(e) Personal information that you communicate or publish via UMA websites

UMA recommends that you do not publish or communicate personal information accessible to the public via UMA websites unless you want that information to be seen by others.

Any comments that you post on the Site will be published on the Site and any other Umusic sites operated by UMA. These comments will be available to anyone on the Internet who is using the Site or other Umusic sites. For a list of all current Umusic sites operated by UMA please contact the customer service team [here](#). Should you choose to publish or communicate personal information, or select features on UMA websites that allow you to display, publish or communicate personal information about yourself to the public via UMA websites, you acknowledge that UMA cannot control the use of such personal information by others.

5. Access and Correction of Personal Information.

Under the Privacy Act, you generally have a right to seek access to the personal information that UMA holds about you and the purpose/s for which it is being held. However the NPPs provide that there are some circumstances in which it is permitted or required to withhold access to some or all of that personal information.

If UMA denies you access based on any of the exceptions set out in the NPPs it will endeavour, where appropriate, to inform you of the exception under which the denial falls.

You also have the right to ask UMA to correct personal information about you that you think is inaccurate, incomplete or out of date.

If you wish to exercise your right under the Privacy Act to seek access to the personal information UMA holds about you, UMA asks that you make a request in writing to its Privacy Officer (contact details are set out in section 10 below). 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 it needs to discuss your request. If you need more information before making a formal request for access, please contact UMA's 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 it 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 UMA's 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, UMA 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, UMA may charge you for the cost of 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 not accurate, complete or up to date, please provide UMA's Privacy Officer with your request for correction (contact details are set out in section 10 below). 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 not accurate, complete and up to date, UMA will correct it for you. If it does not agree with your view, UMA will provide you with reasons for its view, and will provide you with an opportunity to make a statement of your view and have it included with the information.

6. Storage and Security of Personal Information.

UMA takes reasonable steps to protect the personal information it holds and controls from such risks as loss, misuse, unauthorised access, destruction, modification or disclosure. The means of protection UMA uses includes, but is not limited to firewalls, password access, secure servers and encryption of credit card transactions. UMA only allows authorised personnel to access personal information, and it is a condition of employment with UMA that its employees maintain the confidentiality of personal information.

UMA cannot guarantee the security of online transactions and communications sent by electronic means or post. You are responsible for ensuring the confidentiality and security of, and for all activities which occur under, any username and/or password assigned to you by UMA in relation to a UMA Website, for the purpose of providing our goods or services to you, and in relation to any purposes incidental to the provision of our goods and services (including without limitation any unauthorised use of your credit card).

UMA protects the personal information it collects in a secure environment. In storing information, UMA takes a number of steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure. UMA employees are required, as a condition of their employment, to treat personal information held by UMA as confidential, and to maintain the confidentiality of that personal information. They are also required to use logins and passwords when accessing UMA systems. UMA imposes strict requirements of security and confidentiality on all third parties as to how they store and handle personal information.

7. Destruction and de-identification of personal information

Unless a legal requirement dictates otherwise, if UMA no longer requires the personal information it has collected from you for the purpose for which it was collected, it will take reasonable steps to destroy or permanently de-identify your personal information.

8. Business contact information.

UMA collects a range of personal information about individuals from its business dealings with them, and with the organisations they work for. UMA's policy is to only use and disclose this business contact information for purposes related to the business context in which the information was collected.

Individuals are entitled to access and request correction of personal information held about them in their business capacity (see section 5 above).

9. Online Privacy Issues.

UMA will apply this policy to all personal information it handles, whether collected online or otherwise. To the extent that this Policy applies to online privacy issues, it is to be read as forming part of the terms of use for

UMA websites. This section 9 is intended to provide more information about privacy for the users of UMA websites.

Generally, if you consent, UMA will use personal information collected online via a UMA Website, to send you special offers and newsletters from UMA. You can change your preference to receive UMA special offers or newsletters at any time by clicking on the unsubscribe link at the bottom of those communications or by logging on to the relevant UMA Website.

(a) Online collection of personal and non-personal information

As outlined in section 3 above, UMA collects personal information through UMA websites when you sign up to receive information from UMA, join one of its clubs or when you contact UMA through its online enquiry forms. UMA websites may also 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 UMA websites and clickstream data.

In addition, UMA websites use cookies to track usage of its websites. 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 for tracking the statistics of its 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.

(b) 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, UMA is not responsible for the privacy practices or policies of that site. UMA suggests that you review the privacy policy of each site you visit, especially if you intend to provide any personal information via the site.

(c) Third Party Advertisements Online

To try and bring you offers that are of interest to you, UMA have 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 click-stream information.

(d) Online Transactions

If you make a purchase through a UMA Website, UMA will process your credit card details securely over the Internet using industry standard SSL (Secure Socket Layer) and encryption technology. With the combination of UMA’s SSL and encryption technology on the Site and a secure browser at your end, UMA will take all measures to ensure that your credit card and anonymity are protected when you purchase online via a UMA Website.

10. How to Contact UMA.

If you have any questions or comments about this privacy policy, if you wish to access any personal information UMA holds about you, or if you wish to make a complaint about how UMA has handled personal information about you, please contact UMA’s Privacy Officer (who is the Head of Human Resources) by one of the following methods:

by telephone: (02) 9207 0500;

by facsimile: (02) 9241 1497; or

by letter: 150 William Lane, Woolloomooloo NSW 2011.

If, after making a complaint to UMA’s Privacy officer, you are not satisfied with the way UMA has handled your complaint, you can make a complaint to the Office of the Privacy Commissioner. For details on how to do this:

visit the Office of the Privacy Commissioner’s website at www.privacy.gov.au;

email its Privacy Enquiries Line: privacy@privacy.gov.au; or

phone: 1300 363 992.

11. Changes to this Privacy Policy.

This privacy policy may change from time to time. UMA will make this policy available to anyone who requests it. For further information about privacy issues and the protection of privacy visit the Australian Federal Privacy Commissioner’s website located at www.privacy.gov.au.

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