

Privacy Policy

Refraction Media 2018

You have come through to this page from a website which is published by Refraction Media.

In this policy, "us", "we" or "our" means Refraction Media (ABN 62 163 349 504) and its related bodies corporate, partnerships and joint venture entities.

We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (subject to exemptions that apply to us under that Act). However, due to the nature of some of our business activities, from time to time, we will handle personal information relying on the media exemption in the Act where appropriate. Where we do so, we will ensure that we comply with the Australian Press Council Privacy Standards. We may also rely on related bodies corporate, employee records and other exemptions in the Act. If you require more information on the collection and use of personal information in the course of journalism, please visit the Australian Press Council Privacy Standards at www.presscouncil.org.au/privacy-principles.

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recent updated policy. Your privacy matters to us, so whether you are new to Refraction Media or are a long time user, please take the time to get to know our practices.

What is Personal Information

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card, direct debit or PayPal account information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What Personal Information Do We Collect and Hold

We may collect the following types of personal information;

- name;

- mailing or street address;
- email address;
- telephone number;
- profession, occupation or job title;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise.

Cookies

In some cases we may also collect your personal information through the use of cookies and other tracking devices. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey.

Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our website and elsewhere on the internet and use that information to provide measurement services and target ads.

You can find out more information about your browsers ad settings and opting out of different advertising through visiting either of the following sites: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

Why Do We Collect, Hold, Use and Disclose Personal Information

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide best possible quality of customer experience.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you;
- to provide you with news, information or advise about our existing and new products and services;
- to communicate with you, including but not limited to, by email or mail
- to manage and enhance our products and services;
- to personalise and customise your experience;
- to provide you with access to protected areas of our websites;
- to conduct competitions or promotions on behalf Refraction Media and selected third parties;
- to verify your identity;
- to provide as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our websites or our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
- as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

What Happens if We can't Collect Your Personal Information

If you do not provide us with the personal information described in this policy, some or all of the following may happen:

- we may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members only);
- we may not be able to provide you with information about products and services that you may want, including information about discounts sales or special promotions.

How Do We Disclose Your Personal Information

We may disclose your personal information to:

- our employees, related bodies corporate, partnerships, joint venture entities, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, mailing houses, newsagents, couriers, payment processors, photographic analysers, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
- our existing or potential agents and/or business partners;
- our sponsors, or promoters of any competition that we conduct or promote via our services;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;

- as required or permitted by any law (including the Privacy Act).

Direct Marketing Materials

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the Spam Act 2004 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us at info@refractionmedia.com.au or by using the opt-out facilities provided (e.g. an unsubscribe link). We do not provide your personal information to other organisations for the purpose of direct marketing unless expressly authorised by you.

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided here.

Accessing and Correcting Your Personal Information

You may request access to any personal information we hold about you at any time by contacting us. Where we hold information that you are entitled to access, we will try and provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.



Members of our websites will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

How You can Complain about a Breach of Privacy

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or verbal means, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred. We may contact you during the process to seek further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representatives will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer

Refraction Media

Post: PO Box 38

Strawberry Hills

Sydney NSW 2012

Tel: 02 91885459



Email: info@refractionmedia.com.au

Disclosure of Personal Information Outside Australia

We may disclose personal information to our related bodies corporate, partnerships, joint venture entities and external service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- our data hosting and Cloud-based IT service providers;
- other external service providers

Security

We will take all reasonable steps to protect the personal information that we hold from misuse, loss or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Changes to Our Privacy Policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated in October 2018.