

**DAILY - PRESS**

**DAILY PRESS  
PRIVACY POLICY**

Daily Press is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au)

## **WHAT IS PERSONAL INFORMATION AND WHY DO WE COLLECT IT?**

Personal Information is information or an opinion that identifies an individual.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

The personal information we collect about you may include:

- name;
- mailing or street address;
- date of birth;
- email address;
- phone number

Under certain circumstances, Daily Press may need to collect sensitive information about you. This might include any information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences, criminal record, or health information.

Please note we do not store any credit card information of a member/user of your site or venue under any circumstance. All credit card data is purged in your website/platform and reasonable steps are taken in ensuring this data is purged in your platform or site.

If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

## **HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

This Personal Information is obtained in many ways including [interviews, correspondence, by telephone and facsimile, by email,

via our website [www.dailypress.com.au](http://www.dailypress.com.au), from your website, from media and publications, from other publicly available sources, from cookies- delete all that aren't applicable] and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your personal information directly from you when you:

- interact with us over the phone;
- interact with us in person;
- interact with us online;
- participate in surveys or questionnaires;
- attend a Daily Pressevent;
- subscribe to our mailing list;
- apply for a position with us as an employee, contractor or volunteer;

## **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- provide you with information or services that you request from us;
- deliver to you a more personalised experience and service offering;
- improve the quality of the services we offer;
- internal administrative purposes;
- marketing and research purposes;

## **TRANSFER OF PERSONAL INFORMATION OVERSEAS**

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained.

## **COOKIES AND REMARKETING**

The Daily Press web site uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the Daily Press web site(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

## **GOOGLE REMARKETING**

When visiting our website, we may store your information within our Google AdWords account, which is designed in such a manner that you may fall under a specific audience. This means we segment our visitors into different demographics and serve you with a different remarketing banner, depending on which demographic you fall under. Google's advertising platform uses third party ad display partners where you may see our ads, which are being triggered due to a previous visit to the Clearwater website. You can opt out of Google's use of cookies by visiting Google's Ads Settings here.

## **WEBSITE ANALYTICS**

Our website uses Google Analytics to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

## **DIRECT MARKETING**

We may send you direct marketing communications and information about our services, opportunities, or events that we

consider may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt out of receiving marketing communications from us at any time by [following the instructions to “unsubscribe” set out in the relevant communication] / [contacting us using the details set out in the “How to contact us” section below].

In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, and website personalisation, and to provide targeted or retargeted advertising content to you (including through third-party websites).

## **HOW TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION**

Daily Press will endeavour to keep your personal information accurate, complete and up to date.

If you wish to make a request to access and/or correct the personal information we hold about you, you should make a request by contacting us and we will usually respond within [insert] days. We will deal with such a request by following the procedure outlined below:

## **RETENTION OF PERSONAL INFORMATION**

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example, record-keeping obligations.

## **SENSITIVE INFORMATION**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual’s racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## **THIRD PARTIES**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances, we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

## **LINKS TO THIRD-PARTY SITES**

Daily Press website (s) may contain links to websites operated by third parties. If you access a third-party website through our website(s), personal information may be collected by that third-party website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website and we are not responsible for the privacy policies or the content of any third-party provider or website. Third party providers/websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

## **THIRD-PARTY TRANSFER OF DATA OVERSEAS.**

We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:

- the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
  - the law or binding scheme can be enforced; or
  - the disclosure is required or authorised by an Australian law or court/tribunal order.
- Online activity

## **DISCLOSURE OF PERSONAL INFORMATION**

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

## **SECURITY OF PERSONAL INFORMATION**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## **ACCESS TO YOUR PERSONAL INFORMATION**

You may access the Personal Information we hold about you and update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Daily Press will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information. In order to protect your Personal Information we may require identification from you before releasing the requested information.

## **MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION**

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## **MISTAKES IN DATA**

We endeavour to ensure all our data is correct and up to date. If any data is incorrect, please contact us.

If any staff internally of Daily Press sends any third-party information to you by accident. This data cannot be used without Daily Press's written consent.

## **DATA SECURITY MANAGEMENT**

### 1. Data Handling & Privacy:

Daily Press does not sell or provide any data to advertisers or third parties. Once imported into the platforms, no data is retained or collected internally by Daily Press systems.

2. Data classification:

Daily Press has a documented data classification standard to govern how information can be shared or disclosed and what protections must be in place depending on its sensitivity.

Information stored on critical systems has been classified with appropriate protections in place.

3. Data retention:

All client data is destroyed within 30 days of cancellation of the service.

4. Personal Information:

The system stores the name, email, phone number, DOB and membership number (other member information as requested by the client) to deliver the service.

5. Data Encryption:

AWS encryption - Customer databases Amazon RDS instances and EBS volumes for new customers are encrypted using AES-256. Encryption keys are managed using AWS Key Management Service (KMS).

6. Daily Press 3rd party vendor partner management (EDM):

Daily Press's IT, Security, and Legal teams are involved with vendor evaluation, selection and approval processes before vendors and partners are onboarded.

The Security review can include, but is not limited to the following:

- Review of data flow and technical architecture diagrams
- Risk assessment related to:
  - Business function that the vendor is performing
  - Data handling and measures taken to protect data
  - Integrations
    - Compliance reporting
    - Access controls and requirements

7. Access control:

Daily Press's established access control processes include, but are not limited to:

Unique user identification and authentication

- Account provisioning and de-provisioning processes
- User credential requirements
- The Principle of Least Privilege
- Shared account management

8. Security Awareness Training:

All Daily Press employees must complete Security Awareness training upon hire and annually after that.

The Security Awareness training includes data privacy and protection, confidentiality, and social engineering. As part of the Security Awareness training, employees must acknowledge and accept the Code of Conduct.

## **CHANGE OF POLICY**

This Policy may change from time to time and is available on our website.

Your Use of This Website and Services of the Daily Press.

While using Daily Press website, you agree not to interfere with or attempt to interfere with the proper working of the site or any transaction being conducted on the website or to gain unauthorised access to any part of the website.

## **INQUIRIES AND COMPLAINTS**

For complaints about how Daily Press handles, processes or manages your personal information, please contact your relevant Account Manager. Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 48 hours for Daily Press to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with [Daily Press's response to a complaint, you have the right to contact the Office of the Australian Information Commissioner (at [www.oaic.gov.au/](http://www.oaic.gov.au/)) to lodge a complaint.

## **HOW TO CONTACT US**

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

### **EMAIL**

[info@dailypress.com.au](mailto:info@dailypress.com.au)