

PRIVACY POLICY

Last updated [6 November 2019]

Dailymail.com Australia Pty Ltd (ACN 166 912 465) ("**Daily Mail Australia**") administers and operates the Facebook Group Insights Community "NAME" (the "Insights Community").

This privacy notice covers the collection of personal information from users and members of the Insights Community ("Panels") (together "**you**" and "**your**") and use of that information by Daily Mail Australia and parties that Daily Mail Australia authorise, such as our suppliers and subcontractors.

This privacy notice applies in addition to the Insights Community Terms and Conditions (the "Terms and Conditions").

1. What kinds of personal information do we collect and how do we collect it

The personal information collected about you depends on how you're using and participating in the Insights Community, but we will only collect your personal information where necessary.

• **Registration Data**

To become a member of an Insights Community, you need to apply to be registered on the Insights Community registration page. . When you apply to register you are asked to provide some basic information about yourself, such as your name, email address, your date of birth and postcode - which we call "Registration Data". Once your eligibility to join the Insights Community is confirmed, you will be added to the closed Facebook group site (the "Site") using the email address you provided. Please note, your account may be deleted if you've been inactive for a period of time, so please make sure that any Registration Data is accurate and kept up to date where the opportunity is presented.

• **Research Task Data**

We may also collect personal information that you submit when you voluntarily complete any of the research tasks (e.g. surveys, polls or forum discussions) we invite you to participate in, or feedback, comments or other information that you provide to us through the Insights Community or otherwise, including any information, photos and/or videos which you may upload. This may also include special category data such as your ethnicity and sexuality, which helps us to ensure that our Insights Community is representative of the Australian population and to conduct research more effectively. Providing special category data is not compulsory, and you may withdraw your consent at any time by emailing us at dmaexclusives@mailonline.com

• **When you contact us**

We may also collect personal information when you contact us or provide us with information through the Insights Community or otherwise at any other point (for instance, when you contact us with an enquiry, request or feedback).

• **Information from your device**

Where you have consented to the use of cookies, information about your use of the Site, including your internet protocol (IP) address, operating system, browser version, cookie details, how long you stay and on which pages, and your navigation around the Site, may also be collected. We may also monitor whether you have opened communications sent to you via the Site. Please see clause 4 (Use of

Cookies) below for more information. Use of cookies may also be subject to facebook's privacy policy - available at <https://www.facebook.com/policy>. See also the Insights Community "About" section.

• **Third party suppliers**

From third party suppliers who have confirmed to us that they are authorised to pass your information to us in accordance with your legal rights.

2. How we may use your personal information?

Daily Mail Australia may use your personal information to:

- administer and manage the Insights Community;
- verify your identity (e.g. when you register as a member of the Insights Community or return to the Site);
- invite you to participate in and communicate with you about research tasks (such as surveys, polls and forum discussion) on the Insights Community and other research activities that may be relevant to you based on the information you have provided to us;
- send you communications about the Insights Community and the Panels (including service messages to make you aware of new features or changes to the Insights Community or Panels);
- collate and aggregate responses to research tasks by you and other members of the Panel;
- create statistical profiles of Panel membership based on the information provided by you and other members of the Panels;
- conduct market research, which may include statistical, technical and logistical analysis and visualisation of data obtained from various sources;
- verify that an Insights Community is representative of the Australian population;
- process and deal with any complaints or enquiries made by or about you;
- monitor and develop the Site and the Panels to improve your experience;
- monitor compliance with and investigate any suspected breach of the Terms and Conditions or other applicable terms.
- to enter you into and administer any prize draws that you are eligible to take part in or, where invited to do so, have asked to be entered into. This is done to reward members for completing research tasks (e.g. surveys, polls and forum discussions).

Some uses of your personal information will only occur where we have sought your prior consent (for example, where we wish to use sensitive personal information). If we require your consent, we will provide you with full details of the personal information that we would like to use and the reason we need it. Once given, you have the right to withdraw your consent at any point. If you withdraw your consent to us using sensitive personal information, we will stop sending you any research tasks which require this information but may continue to send you other research tasks and we may still use the anonymised, aggregated data which we have created using your personal information. We may continue to send you other research tasks and we may still use the anonymised, aggregated data which we have created using your information.

3. Emails regarding Insights Community and Panels

- You may receive emails from Daily Mail Australia or our contractors (including Facebook and Survey Monkey) in connection with the Insights Community and the Panels. This includes emails about new features or changes on the Site; information about new surveys, polls or forum discussions on the Site; other research activities that may be relevant to you based on information you have provided to us; information about rewards, including prize draws in connection with research tasks on the Site.
- By registering to be a member of the Panel you acknowledge that you understand that these emails are necessary for us to provide our research services. You can unsubscribe from these emails at any time by

clicking on the "unsubscribe" link at the bottom of any of the emails. Alternatively, you can email us at dmaexclusives@mailonline.com from your registered email address and ask us to unsubscribe you.

4. Use of Cookies

A "cookie" is a small text file that is placed on your hard disk by a Web server. Cookies contain information that can later be read by a Web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer.

The Closed Facebook Group Site may use cookies to enable you to sign in to our services and to help personalise your online experience. One of the primary purposes of cookies is to store your preferences and other information on your computer in order to save you time by eliminating the need to repeatedly enter the same information and to display your personalised content. The Site also uses cookies as described in clause 1 above ("What kind of personal information do we collect and how do we collect it").

Your use of the Closed Facebook Group Site will be subject to Facebook's cookie policy available at <https://www.facebook.com/policy/cookies/>.

5. How your personal information may be shared

- Daily Mail Australia has access to those parts of the Site that are visible to other Panel members as well as open and closed online discussion forums on the Insights Community, and may engage with you directly via such discussion forums and other areas of the Site.
- Daily Mail Australia may disclose aggregated and anonymised results of the research tasks to other members in the Daily Mail Australia group of companies and third parties (such as advertiser clients and media buying agencies).
- Daily Mail Australia may also disclose your personal information to other parties as follows:

o to third parties authorised by us and acting on our behalf such as contractors, suppliers and/or agents including without limitation our customer care teams to administer and manage the Insights Community and the Panel now or in the future. These third parties are only allowed access to your personal information as needed to perform functions connected with the Insights Community and the Panel, or to provide services to us. They're not allowed to use it for any other purpose.

o to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence, unlawful activity or suspected breach of the Terms or where required by law or where we suspect harm or potential harm to others..

We may also disclose information relating to you to third parties as part of general statistical information about the Panel's membership base, traffic volumes and related matters. These details will not include information from which you could be personally identified.

6. Publically available information

Please note that the Insights Community contains public forums and pages which are displayed to other members of the Panel. When you engage with these areas, your user name and some profile information you voluntarily provide and your submissions will be publicly available within the Insights Community. Please always think carefully before disclosing information to other users or otherwise making your information publicly available.

7. How we store your personal information

Daily Mail Australia may hold your personal information in electronic or hard copy format or a combination of both. Daily Mail Australia may hold information about you in a central database, where we hold information about all of our customers. This personal information may be combined or linked with other information held about you, including information that we receive from third parties. We have taken a number of physical, electronic and procedural steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Daily Mail Australia protects the personal information it collects in a secure database stored by our third party data storage provider. It is in proprietary data format, which can only be read using proprietary tools.

Daily Mail Australia also employs firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems.

Daily Mail Australia employees are required, as a condition of their employment, to treat personal information held by Daily Mail Australia as confidential, and to maintain the confidentiality of that personal information.

8. Management and security of personal information

Personal information collected on the Site will be stored and processed in Australia. If Daily Mail Australia or any of its third party contractors or service providers performs some of their services overseas, Daily Mail Australia will notify you and take reasonable steps to ensure that all personal information is handled in a manner that is consistent with this Privacy Policy and the Australian Privacy Principles under the Privacy Act (the "APPs").

We take physical, electronic and managerial steps to ensure that the personal information we hold is secure from unauthorised access, destruction, use, modification or disclosure. We only permit your details to be accessed by authorised personnel and we educate our staff about their responsibilities under the APPs.

Additionally, we take reasonable steps to destroy or permanently de-identify personal information when we no longer need it. We also impose strict requirements of security and confidentiality on all third parties as to how they store, handle and deal with personal information.

In striving to ensure that the security, integrity and privacy of personal information submitted to our site is maintained to the highest level, Daily Mail Australia regularly reviews and updates its security measures in light of current technologies. Unfortunately, no data transmission over the internet or publicly available website can be guaranteed to be totally secure and you need to be aware of this when using any of the Site.

9. Access to personal information

Under the Privacy Act, you have the right to request access to the personal information which Daily Mail Australia holds about you. There are some limitations to this right set out in the Privacy Act, which mean that we can refuse to provide you with access to that information in limited circumstances, including where granting you access might have an unreasonable impact on the privacy of other individuals, if the request is frivolous or vexatious, or if the information relates to anticipated legal proceedings.

If you wish to exercise your right under the Privacy Act to seek access to the personal information that Daily Mail Australia holds about you, we ask that you contact Daily Mail Australia using the contact details set out below. Generally, Daily Mail Australia will endeavour to acknowledge your request for

access within 7 days, and to provide you with access within 30 days of the date of receipt of your request. We will notify you if we consider it will take longer than 30 days to provide you with access.

10. Correction of personal information

Daily Mail Australia endeavours to ensure that the personal information it holds is accurate, complete and up-to-date.

You have the right to ask us to correct information about you which is inaccurate, incomplete, out of date, not relevant or misleading. Daily Mail Australia is required to take such steps (if any) as are reasonable in the circumstances to correct the information. You are able to seek correction of your personal information that we hold about you, by notifying our Privacy Officer. Daily Mail Australia's policy is to respond to your request for correction within 30 days of receipt.

11. Data retention and account deletion

We will keep your personal information for only as long as necessary, which is longer in some cases than in others. The length of this retention period depends on the purpose for which the information was obtained and its nature. For example:

- We may need to keep some personal information about you so that we can deal with any complaints you might make about the Insights Community or the Panel or our services.
- If you ask us to stop sending you emails in connection with research tasks, the Insights Community and the Panel, we need to retain enough information about you to enable us to ensure we stop including you in any communications.
- We may need to keep personal information so that we can defend possible future claims.

12. Closing your account

You may leave the Insights Community at any time. If you do so, you will be unable to access the Insights Community and you will no longer receive emails from us.

If you leave the Insights Community, we may continue to process your data for contractual reasons e.g. If we need to provide you with a prize won before exiting the Community. Please note, if you have not earned a reward or incentive at the time you delete your account, you will forfeit any rights to try and earn or receive those incentives or rewards.

We reserve the right to suspend or terminate your access at any time, at our sole and absolute discretion. This may be because, for example, we consider that you have breached the Terms and Conditions or any other applicable terms or if you have been inactive for a period of time.

We may close the Panel and your account when the research programme ends or is cancelled. In these circumstances, we will inform all Panel members by email of the Panel being closed, at which point your access to it will cease.

13. Business Changes

Daily Mail Australia may choose to run the Insights Community or the Panel itself or to appoint a new supplier to run it in which case your information may be passed to that new supplier. Use of your personal information will remain subject to this privacy notice (as amended from time to time).

If Daily Mail Australia becomes involved in a merger, acquisition, restructuring, reorganisation or other transaction involving the sale of some or all of our assets, then your information may be included in the assets that are transferred to the new owner and may be provided to the entities and advisers involved. Such a transaction may involve Daily Mail Australia: (i) retaining the right to continue to use transferred personal information in addition to the right of the new owner to use such information; and (ii) engaging in additional transfers of personal information (including new personal information) with the new owner

from time to time following such a transaction. Daily Mail Australia will provide notice to you before any of your personal information becomes subject to a different privacy notice.

124 Updates to this Policy

We reserve the right to make changes to this Policy. Where changes are made, we will post the revised Policy here with an updated effective date. Please check regularly for any changes to this Policy.

16. How to contact us:

If you have any queries or comments about this Privacy Policy, complaints regarding how we handle your personal information or would like to make an access request, please contact Daily Mail Australia by writing to:

Privacy Officer
Dailymail.com Australia Pty Limited
Level 12, 207 Kent St
Sydney NSW 2000

or via e-mail on the following email address: dmaexclusives@mailonline.com

Private and confidential