

# Ensemble / MediaBrands Privacy Policy

MediaBrands Australia Pty Ltd (ABN 19 002 966 001) together with our various business units including: Reprise, Ensemble, UM, Initiative and Society ("**MediaBrands**", "**we**", "**us**" and "**our**") provides advertisers ("**Advertisers**") media planning and buying, analysis, testing, design and creation services for media campaigns, apps and websites, targeted advertising services and facilitates the delivery of advertisements to consumers across mobile devices and the Internet (the "**Advertisement(s)**").

This privacy policy describes our management of personal information.

## 1. Kinds of personal information we collect and hold

We collect information about internet users who view the sites and advertisements of our clients or otherwise engage with us or our clients.

The kinds of personal information we collect and hold includes the server a device is logged onto (i.e., the user's IP address), the browser type (for example, FireFox, Internet Explorer or Chrome), the browser settings being used (including language), security, how many Advertiser webpages have been viewed, search terms entered on Advertiser websites, referral URLs, and the date and time of website visits.

We may also collect demographic, inferred psychographic and online behavioural information linked to digital identifiers. Examples of information collected or inferred include, gender, age, postcode, inferred purchase intent (e.g. consumer who books a test drive might be considered an 'auto intender') and inferred interests (mostly based on website history).

If you SMS us we may collect your mobile number, carrier, device, time stamp and information included in the SMS. If you contact us by phone we may retain your voice recording and the information you enter on your key pad. If you contact us through social media we may collect the information that you provide or make available to us.

When conducting social media analysis we may collect user or author name (avatar), location (country, region, state, city), language, user biography, number of fans and followers, number of posts and views and blog URL, photo or video upload.

We may also ask you to provide your name, phone numbers, email address, age, gender, location, occupation, income, children status, household status, respondent coordinates, other GPS tracking info, videos/photos of respondents. If you win a competition we may request your bank information. With your consent, we may collect or form opinions regarding sexual preferences or orientation, ethnic origin, philosophical beliefs, membership of a professional or trade association, health information or biometric information.

We may also collect data regarding geographic location, time/date stamp, purchase value, conversion types, purchase currency, Product ID, PayPal unique identifier and site performance data.

When you communicate with us in person, including over the phone or by email, we may collect your name, address, and contact details. In some circumstances we may collect your name, address and contact details from a third party who is dealing with us on your behalf.

### **Information Relating to Children**

We obtain the permission of their parent or guardian before collecting information from a person under 18 years of age. . If we are made aware that we have received personal information from someone under 18, we will use reasonable efforts to remove that information from our records.

### **Data Collection Is In Australia**

The sites and our services are operated from Australia. If you are located outside of Australia, please be aware that any information you provide to us will be collected within Australia. By using our sites and/or participating in any of our offerings you consent to your data being collected in Australia.

## **2. How we collect and hold personal information**

### **Overview**

We collect information about the website(s) that you visit, apps that you download and use, and the advertisements that you see while online via our technology provider (the “**Technology**”). You may encounter the Technology when:

- (a) we or one of our Advertisers displays online advertisements on a website that you visit;
- (b) you download or use a mobile app offered by us or one of our Advertisers;
- (c) you open an email that contains an advertisement placed by us or one of our Advertisers;
- (d) one of the Advertisers places one of our web beacons on a website that you visit;
- (e) you otherwise engage with us or one of our clients using a variety of means.

If you create a account with one of our websites or complete an online form, participate in a focus group or other formal research project we may collect detailed information regarding your preferences and behaviours including, with your consent, personal background and sensitive information with in the meaning of the [Privacy Act 1988 \(Cth\)](#) .

We use personal information that is provided to us and personal information that is collected during our engagements to produce industry and industry sector data, analytics and targeting. We apply the personal information to improve the general effectiveness of the services we provide to all our clients.

We also collect and hold personal information in the ordinary course of running our business including in relation to recruitment, business contacts, supplier and customers, their employees and representatives.

### **Cookies**

We use adservers to deliver online advertisements for our clients including but not limited to Double Click for Advertisers, Sizemex and Atlas. These services use adserver cookies and web beacons in connection with the Technology. Cookies are small text files that contain a string of alphanumeric characters. Certain cookies, persistent cookies, remain on your hard drive for an extended period of time. Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. You can also remove persistent cookies by following directions provided in your Internet browser's "help" file. Cookies help us better understand the effectiveness of our Advertisement (for example, by tracking the way in which you may respond to, and interact with, our Advertisement, or the location and context in which you view our Advertisement). Our cookies may also help control the number of times you view our Advertisement.

### **Third Party Links and Websites**

Advertisements may contain links to other websites, including those of the Advertisers and our contractors and affiliates. Such websites may use cookies and/or other data collection tools. We are not responsible for the privacy practices, policies or the content of such websites. We encourage everyone to read the posted privacy policies whenever interacting with any website to learn more about the privacy practices of that website. We have no control over the use of any information by third party websites, and you should exercise caution when deciding to disclose any information. Similarly, We do not have access to, or control of, the cookies and/or other data collection tools that may be placed on any advertisement by a third-party, including those of the Advertisers, and this Privacy Policy does not cover the use of cookies and/or other data collection tools by any third party other than in connection with the sites and our services.

### **Opting out**

If you would like to opt-out from having our partners collect your information in connection with our sites and the Technology, you may control your privacy settings using the DAA and NAI Opt-out links below, which allow consumers to not participate in the behavioural advertising delivered by DAA and NAI member companies, respectively:

[DAA Opt-Out Page](#)

[NAI Opt-Out Tool](#)

Cookies will need to be enabled when you visit the opt-out site as when you opt out, we will place an opt-out cookie on your computer. The opt-out cookie tells us not to collect your information to tailor Advertisements to your interests. Please note that if you delete, block or otherwise restrict cookies, or if you use a different computer or Internet browser, you will

need to renew your opt-out choice or adjust your browser settings to allow the opt-out cookie to be effective.

You may also have the option to view your profile, edit it or opt-out of receiving targeted ads, on websites operated by companies who are signatories of the Australian Guidelines for Third party On-line Behavioural Advertising. You can find out more information about your options at [www.youronlinechoices.com.au](http://www.youronlinechoices.com.au).

### **3. The purposes for which we collect, hold and use personal information**

We use the information collected by the Technology in order to help make the Advertisements of our Advertisers more relevant to you, and for Advertisement delivery and reporting purposes including to optimise the effectiveness of advertising campaigns of our Advertisers and for internal business purposes including data analytics.

We analyse trends, identify the audience most likely to respond to an advertisement and to tailor advertisement placements for our Advertisers accordingly. We can also perform analysis on the type of consumers who are responding to advertising or visiting client's website for use in further refining targeting strategies. This information will not be used by us to contact or identify any person individually.

We do not use the personal information collected by the Technology to contact or identify any person individually.

We may send existing customers information and marketing materials relating to the business. We abide by Australian laws relating to the use of electronic messages (email, SMS, MMS and instant messaging), telephone and faxes for marketing purposes. We allow recipients to 'opt-out' from receiving marketing messages from us at any time.

In case of competitions within an influencers program, the personal information is used to order delivery of a prize or to contact directly to organise a winner's experience.

Our social listening team creates infographics, anonymised social statistics gathering and reporting to share with and present to clients.

#### **Disclosure of personal information**

We may share information collected via the Technology with Advertisers or other contractors or technology vendors in connection with our services. Similarly, we may enhance the information collected via the Technology with information collected from Advertisers or other ad networks.

In case of community management, we forward on details to clients who may contact individuals participating in online communities to resolve any issues they may have, or to award them with a prize.

We may also disclose information about our customers or individuals who use our services to any third party within a permitted general situation or a permitted health situation as described in the [Privacy Act 1988 \(Cth\)](#).

### **Assignability**

If all or part of MediaBrands is sold, merged or otherwise transferred to another entity or undergoes any other corporate change or restructuring, whatever form it may take, your personal information or other information may be transferred as part of that transaction.

### **Storage and destruction of Information**

We retain the information collected in the course of our market research activities until one year from the date our engagement has concluded whereupon the information will be either destroyed or de-identified. De-identified information may be maintained as relevant industry information indefinitely.

Data associated identifiers (which may or may not relate to an individual depending on the data and the user/s) is useful for approximately 90 days and cookies (which establish the link between internet user and personal information) self-destruct after a specific time period. Any personal information is also wiped from the database when the cookie is due to destruct.

We retain anonymous information collected via the Technology in order to ensure that the Technology is functioning properly. This information may be stored indefinitely.

## **4. How you can access and seek correction of your personal information**

You can seek access and correct any personal information that we hold about you by sending a written request to our contact details below. In most circumstances we will agree to provide you with your personal information and allow you to make any corrections however in some circumstances we may not. The circumstances include:

- (a) we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) giving access would have an unreasonable impact on the privacy of other individuals; or
- (c) the request for access is frivolous or vexatious; or
- (d) the information relates to existing or anticipated legal proceedings between us and you, and would not be accessible by the process of discovery in those proceedings; or
- (e) giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations; or
- (f) giving access would be unlawful; or

- (g) denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- (h) both of the following apply:
  - (i) we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in;
  - (ii) giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information generated within MediaBrands in connection with a commercially sensitive decision-making process.

## **5. How you can complain about a breach of privacy**

Please let us know if you have any concerns or complaints about how we have handled your personal information using our contact details below. If we receive a complaint, we will contact you as soon as possible to discuss this with you. We take your privacy seriously and will work with you to address any concerns you have. If you are not satisfied with our handling of your complaint or we do not respond within a reasonable period of time, you may proceed to lodge a complaint with the [Office of the Australian Information Commissioner](#).

## **6. Disclose of personal information overseas**

Some of our information systems and third party service providers are located outside Australia. To the extent that we may disclose your personal information to our related parent company in the United States of America. We may also provide third parties with access to your information in order to store and process it. These parties are located in the United States of America, Singapore, France, Israel, Ireland and other countries.

However, we do not allow third parties who are given access to information to use it for any other purpose. They are required to keep it secure and not to disclose to third parties.

## **7. Information Security**

We have implemented reasonable security measures in order to protect information from loss, misuse and unauthorised access, disclosure, alteration or destruction.

While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security and make no warranty as to security. If you have any questions about our security practices, please send an email to our contact email address below.

## **8. Changes to this Privacy Policy**

This privacy policy is subject to change. If we make any material or substantive changes in the way that we use data, we will post a conspicuous notice of those changes on the sites and in this privacy policy.

## **9. Contact Information**

For questions or concerns relating to privacy, please send us an email at [privacy@MBWW.com](mailto:privacy@MBWW.com)