

CARS & STARS Online

PRIVACY POLICY

In this Privacy Policy, "us", "we", "our" or "HBD" means Hawker Brownlow Digital Pty Ltd (ABN 15 629 535 548) and its divisions and related bodies corporate.

We recognise the importance of privacy and are committed to protecting your privacy when handling your personal information.

This Privacy Policy explains how we handle personal information in an open and transparent manner in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) ("Privacy Act") and other applicable privacy laws. Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable.

This Privacy Policy will be reviewed from time to time to take account of new or amended laws, new technology and/or changes to our operations and practices and the changing business environment. All personal information held by us will be governed by the most recently updated policy. This Privacy Policy addresses the following:

- what information we collect;
- if you are a minor (aged under 18 years);
- how we collect information;
- why we collect it;
- how we use it;
- how we disclose it;
- opting in or out;
- how we hold it – management and security;
- accessing and updating or correcting your information and how to contact us.

What information we collect

The personal information we may collect about you includes (but is not limited to) your name, contact details (including phone numbers and addresses), gender, date of birth, occupation, transaction information and other information which may assist us in conducting our business, and providing and marketing our products and services. In certain circumstances we collect financial information, including your credit card information where appropriate.

We also collect information about you that is not personal information. For example, we may collect data relating to your activity on our websites (including the type of internet browser you use, your operating system, address of referring site, your IP address and other clickstream information) via tracking technologies such as cookies, or we may collect information from you in response to a survey, promotion or competition. We may use Google Analytic tools from time to time. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems, advertise online, optimise our advertising and websites and target and improve the quality of our products and services.

Cookies allow your browser to utilise some of the features of our websites. We use both session ID cookies and persistent cookies, first party cookies (such as Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to our website, to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our site. Third-party vendors, including Google, may show our ads on sites across the Internet. Most web browsers are set by default to accept cookies. If you reject cookies you will be unable to take advantage of some of the features of our websites. To the extent this information does not constitute personal information, the Privacy Act is not applicable and we may use this information for any lawful purpose.

We generally advise that you do not publish or communicate personal information, or at least limit the personal information that you publish or communicate, to the public via our services, such as in any forums, blogs or anywhere that user generated content can be uploaded ("Non-Confidential Information"). We cannot control any third party collection or use of your Non-Confidential Information that is publicly available.

If you are a minor (aged under 18 years)

We provide subscription services to children and young adults who are legally minors and may not be able to provide valid consent to our collection, use, disclosure, storage or other handling of their personal information. From time to time we may also conduct competitions and other promotional activities and provide other services for children/minors who may or may not be subscribers to our online services or newsletters.

Parents and guardians of children/minors are personally responsible for monitoring their child's/minor's access to, and use of, our services and for providing valid approvals for their child's/minor's participation in subscription, competitions and other promotional activities conducted by us.

If you are a child or young adult under the age of 18 years, you must ask your parent or legal guardian to approve your provision of personal information before you submit your personal details to us.

How we collect information

We may collect your personal information from a variety of sources, including from you, advertisers, mailing lists, recruitment agencies, contractors and business partners.

We will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, electronic communications, telephone conversations and from third parties (including representatives, agents and credit reporting agencies). In addition, we collect personal information from our websites and social media web pages (e.g. Facebook, Twitter, Instagram, Pinterest and Tumblr) through receiving subscription applications, job applications, competition applications, promotion entries (including posts, comments/likes, messages and votes) and other electronic documents and information.

We may collect your personal information when you request or acquire a product or service from us, register with us as a subscriber or member, provide a product or service to us,

complete a survey or questionnaire, enter a competition or event, contribute in a fundraising event, participate in our services (including blogs and forums) or when you communicate with us electronically (including email and facsimile), by telephone or in writing (for example if you make a complaint or provide feedback).

If, at any time, you provide personal or other information about someone other than yourself, you must have that person's consent to provide such information for the purpose for which you provide it to us.

Why we collect it

The primary purpose for which we collect information about you is to conduct our business, provide and market our products and services or products and services of other members of the HBD to you, meet our legal or regulatory obligations, and also for the management of business transactions entered into with us and the administration of any accounts you have with us. We may state a more specific purpose at the point we collect your information (including but not limited to any law that requires or authorises the particular information to be collected).

If you do not provide us with all or some of the information that we request, we may not be able to provide you with our products or services or market our products and services or products and services of other members of the HBD to you. 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 or subscribers only.

How we use it

In addition to the primary purpose outlined above, we may use the personal information we collect, and you consent to us using your personal information:

- to provide you with news and information about our products and services or products and services of other members of the HBD, and opportunities that we believe you may be interested in;
- for purposes necessary or incidental to the provision of products or services to you including processing order details, tracking numbers and other transaction information;
- to personalise and customise your experience purchasing or using our products or services;
- to manage and enhance our products and services;
- to communicate with you, including by email, mail or telephone;
- to conduct competitions or promotions;
- to verify your identity;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity;
- as part of any investigation in relation to you or your activity which we suspect to be a breach of any of our terms and conditions, serious misconduct or unlawful;
- as part of a sale (or proposed sale) of all or part of our business; and/or

- as required or permitted by any law or regulation (including without limitation the Privacy Act).

How we disclose it

We may disclose personal information from your order, and you consent to us disclosing your personal information, to third parties:

- for purposes necessary or incidental to the provision of products or services to you including the disclosure of order details, tracking numbers and other transaction information to Google Inc. for processing and other use for the Google Certified Shops program;
- engaged by us to perform functions or provide products or services on our behalf, such as processing of credit card information, technical or product support, mailouts, debt collection, marketing, research or advertising. Such third parties include third parties that operate MailChimp, SurveyMonkey (including Wufoo) and Campaign Monitor;
- that are our agents, business partners or joint venture entities or partners;
- that sponsor or promote any competition or activity that we conduct or promote via our services;
- authorised by you to receive information held by us;
- as part of any investigation in relation to you or your activity which we suspect to be a breach of any of our terms and conditions, serious misconduct or unlawful (including disclosure to the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator);
- that are our external advisers or potential or actual bidders or their external advisers as part of a sale (or proposed sale) of all or part of our business; and/or
- as required or permitted by any law or regulation (including the Privacy Act).

Some of these third parties to which we may disclose your personal information may be located in Australia, New Zealand, Singapore, the United States, the United Kingdom, Luxembourg, Ireland or other countries.

Opting in or out

At the point we collect information from you, you may be asked to "opt in" to consent to us using or disclosing your personal information for purposes other than those that are expressly stated in this Privacy Policy. For example, you may be asked to opt-in to receive further information or communications from our advertisers or supporters.

You will be given the opportunity to "opt out" from receiving communications from us or from third parties that send communications to you in accordance with the Privacy Act and other applicable privacy laws. For example, you will be given the option to unsubscribe to emails or newsletters sent by us.

You may also opt-out of Google Analytics and customise your Google Display Network ads by using the Ads Settings. You can also access Google Analytics' currently available opt-outs for the web.

How we hold it - management and security

We have appointed a Privacy Officer to oversee the management of personal information in accordance with this Privacy Policy, the Privacy Act and other applicable privacy laws.

Other than in relation to Non-Confidential Information, we will take all reasonable steps to protect the personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure including by means of secure premises, locked cabinets, firewalls, password access, secure servers and encryption of credit card transactions.

However, you acknowledge that the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. You provide information to us via the internet or by post at your own risk. We cannot accept responsibility for misuse, interference or loss, or unauthorised access, modification or disclosure in respect of your personal information where the security of the information is not within our control.

If you suspect any misuse, interference or loss, or unauthorised access, modification or disclosure in respect of your personal information, or any other privacy breach please let us know immediately.

Accessing and updating or correcting your information and how to contact us

Subject to the exceptions set out in the Privacy Act and other applicable privacy laws, you may request to access, update or correct the personal information we hold about you. We will require you to verify your identity and to specify the information that you wish to access, update or correct. A fee may be charged for providing access however we will advise you of the likely cost in advance.

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

If you wish to access, update or correct any personal information that we hold about you, or if you have any questions or require a complaint dealt with about how we collect, use, disclose, store or otherwise handle your personal information, you can contact the department that collected your personal information in the first instance, or write to:

The Privacy Officer
Hawker Brownlow Digital Pty Ltd
U2 47 Wangara Rd
Cheltenham VIC 3192
Email: privacy.officer@hb-digital.com.au