

# CEJN AUSTRALIA PTY LTD PRIVACY POLICY

## Your personal information

CEJN Australia Pty Limited (**CEJN Australia**) recognises that your privacy is very important to you. CEJN Australia is committed to protecting your personal information and will comply with any laws introduced to strengthen protection of consumer privacy.

This Privacy Policy applies to personal information we handle about subscribers to our publications (**subscribers**), visitors to our websites and digital publications, recipients of our other electronic communications, users of other services we may provide, and members of the public. It provides information about the personal information that we collect, and the ways in which we use that personal information.

## Collection of personal and other information

CEJN Australia collects both personal information and anonymous information.

The only personal information collected is what you tell us or an authorised third party about yourself. This may include name, contact details, information relating to dealings with us, and interests and preferences in relation to our services and events. As a subscriber to our products, visitor to our websites and digital publications or recipient of our other electronic communications, or as an advertiser or other contact, you may submit personal details about yourself, including by email or online form. This personal information may be stored in our database.

From time to time, CEJN Australia may invite you to participate in surveys or offer additional products or services related to those that you may already access. Your participation in any surveys will be anonymous to us and your answers will not be linked to you in any way, except where you consent to provide relevant contact information for purposes specifically stated within the survey, such as the offer of a prize or free product/service trial. If you express interest in any offer presented to you by CEJN Australia and its associated entities, relevant contact information will be used solely for the purpose of fulfilling the offer. Subsequent use of any personal information will be subject to the Terms and Conditions associated with the specific provision of that product/service.

Your web browser automatically provides us with the type of browser you are using, when you visited our online or digital publications, your top level domain name (for example .com, .gov, .au, .uk etc), the address of the website that directed you here, your server's IP address and which pages you viewed. We only use this information for statistical and internal purposes including improving the functionality of our website and digital editions.

Generally, we try to collect personal information directly from you, however sometimes we may collect personal information from publicly available records, information brokers and third parties.

If we are not provided with the personal information that we request, we may not be able to fully provide our services to you.

## Use of personal information

Unless required by law, CEJN Australia will not use or disclose any of your personal information except in accordance with this policy.

To the extent that CEJN Australia obtains your personal information, it may use and disclose it in order to:

- respond to your queries;
- maintain our relationships with you and others;
- administer our website;
- personalise websites or publications for you;
- enable your access to and use of publications and website services;
- send to you publications or other products that you purchase or request;
- supply to you services that you purchase;
- send you statements and invoices;
- collect payments from you;
- compile our databases;
- conduct research for our own internal marketing purposes within the CEJN Australia group of companies;
- send you marketing communications, which may include communications in relation to other companies or divisions of CEJN Australia, or products or services offered by those companies

- or divisions; and
- partner with third party organisations in order to present to you products or services we believe may be of interest or benefit to you.

All such communications will contain suitable links to enable you to opt out of further communications, or you can email CEJN Australia on [sales@cejn.com.au](mailto:sales@cejn.com.au)

Where CEJN Australia discloses your personal information to its partner organisations for these purposes, CEJN Australia will use best endeavours to ensure that the organisation in question agrees that it will use your personal information in accordance with the terms of this Privacy Policy.

### **Anonymous information**

We may use anonymous information collected from you for internal purposes including improving our products and services.

Some anonymous demographic information, including but not restricted to, age, location, gender, occupation and total net worth and assets may be provided to advertisers for the sole purpose of their designing advertisements for the website. All information disclosed in these circumstances will be de-identified and stripped of personal information. Your personal information will not be disclosed.

### **CEJN Australia's use of "cookies"**

CEJN Australia's websites use cookies to manage user access and subscriptions. A cookie is a small text file that a server places on your hard drive to identify that subsequent requests to a site have come from the same user. CEJN Australia uses cookies to 'remember' your browser between page visits.

The cookie records only your member identification number. After your initial log in to a website, CEJN Australia recognises you as a member and, if your subscription is current, facilitates direct access to news stories. If the 'cookie' is not present, members will be asked to provide their login credentials (email address and password) on subsequent visits to subscriber-protected sections of websites.

Members who choose not to accept 'cookies' from any of CEJN Australia's websites can use the service by entering their email address and password at the beginning of each visit.

To view a sample of the content of CEJN Australia's cookies please contact us at [sales@cejn.com.au](mailto:sales@cejn.com.au)

### **Storage and security of your details**

CEJN Australia will endeavour to take all reasonable steps to keep secure any information that it possesses about you. CEJN Australia encourages you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on websites. It is your sole responsibility to maintain such confidentiality and CEJN Australia will not be liable for any damage, loss or expense suffered due to such disclosure.

### **Your Right to Access and Amend Information about you**

If you wish to seek access to or to request correction of any personal information we hold about you, please email us using [sales@cejn.com.au](mailto:sales@cejn.com.au) We request that you provide us with as much detail as possible about the particular information sought in order to help us retrieve it. In certain circumstances, we may not be required by law to provide access to or to correct personal information. If that is the case, we will give you our reasons for that decision.

We take reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

### **Cross-border data transfers**

Personal information that CEJN Australia collects may be stored and processed in and transferred between any of the countries in which CEJN Australia or its service providers operate (including Australia, the United Kingdom, Hong Kong, the United States of America, Brazil, Sweden and other locations utilised by any potential future reputable third-party partners). The Privacy Act, and corresponding Australian Privacy Principles (APPs, which come into effect on 12 March 2014), requires relevant Australian entities to ensure that, before disclosing personal information overseas, reasonable steps are taken to ensure that overseas recipients do not breach the Privacy Act and corresponding Privacy Principles (APP 8.1). While CEJN Australia endeavours to do this, it is not always possible to ensure that overseas recipients will comply. CEJN Australia does not take responsibility for the actions of third party recipients of personal information overseas. By accepting this Privacy Policy you are agreeing that your personal information may be disclosed overseas, and that APP 8.1 will not apply to that disclosure.

In addition, personal information that you knowingly submit for publication on any of CEJN Australia's websites or digital publications will be published on the internet and may be available around the world.

#### **Other websites**

CEJN Australia's websites may contain links to third-party websites. CEJN Australia is not responsible for the privacy policies or practices of any such third parties.

#### **Acts in the course of journalism**

To the extent that CEJN Australia carries on activities in the course of journalism (including investigating, preparing and publishing news, articles, reviews and current events), then its acts may be exempt from the requirements of the Privacy Act. However CEJN Australia will deal with personal information in accordance with the privacy standards as set out by the Australian Press Council.

#### **Contact Us - Questions or Complaints**

CEJN Australia has an internal complaints process to deal with queries or concerns regarding our handling or disclosure of your personal information.

If you have any questions or complaints about this Privacy Policy or CEJN Australia's treatment of your personal information, please write to our Privacy Officer at [sales@cejn.com.au](mailto:sales@cejn.com.au) or to CEJN Australia Pty Limited, PO Box 329, Winston Hills, NSW, 2153.

We will endeavour to:

- a. provide an initial response to your query or complaint within 48 hours; and
- b. resolve your query or complaint within 14 days.

If you are still not satisfied, you can contact the Australian Privacy Commissioner (see <http://www.oaic.gov.au/about/contact.html> or call 1300 363 992).