

PRIVACY POLICY

Last updated 27 October 2020.

1 WHO WE ARE

We take your privacy seriously and are committed to ensuring that your personal information is protected in compliance with the Australian Privacy Principles in the *Privacy Act 1988* (Cth) ("**Privacy Act**"). This Privacy Policy explains the personal information protection practices of Sony Music Entertainment Australia Pty Limited, a company registered in Australia with Australian Company Number 107 133 184 and whose registered address is 11-19 Hargrave Street, East Sydney, NSW 2010. Where we refer to "Sony Music Entertainment", "us" or "we", we mean Sony Music Entertainment Australia Pty Limited (or any Sony Music Entertainment entity using your personal information in accordance with this policy).

This Privacy Policy describes how we collect, use and disclose personal information, including the personal information obtained through the Sony Music Entertainment network of websites (including sonymusic.com.au and any related websites which link directly to this Privacy Policy). Please read the text carefully to understand our views and practices regarding your personal information and how we will treat it.

2 A SPECIAL NOTE TO CHILDREN UNDER 13 YEARS OF AGE

You must be 13 years of age or older to register with our sites or engage with our promotions or competitions. Please do not register if you are under 13 years of age.

3 A SPECIAL NOTE TO PARENTS

Parents should supervise their children's online activities and consider using parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. These tools can also prevent children from disclosing online their name, address, and other personal information without parental permission.

4 TYPES OF INFORMATION WE COLLECT

4.1 If you are a customer or user of our sites

If you are a customer or user of our sites, we collect information about you to allow you to use the features on our sites, to process your registrations with us, to provide you with requested content and to otherwise facilitate your dealings with us. This information may include:

- Contact information such as name, email address, street or mailing address, and phone number;
- Billing information such as credit card number and billing address;
- Demographic information such as age, date of birth, gender, interests, country and post code;
- Unique identifiers such as user name and password;
- Preference and other information such as product wish lists, order history, marketing and music preferences;
- Geolocation information such as your actual or approximate location (for example, from the IP address of your device or computer);
- Photos and videos that you submit on our sites; and
- Internet and other electronic network activity (such as your browser type, Internet Service Provider (ISP), number of visits and clickstream data).

You are not required to provide us with this information but, if you choose not to, you may not be able to register to use our sites or participate in some of the activities on our sites.

4.2 If you do business or have other dealings with us

If you, or your employer, does business with us or has other dealings with us, we collect information about you to facilitate those arrangements. This information may include your name, position, contact details, and any other information you provide.

4.3 If you are an employee or applicant

If you are an employee or a job applicant, we collect information about you to administer your employment or process your application. This may include qualification and identification information, residency / visa status information, medical records and health information, psychological testing results and results from records checks. If you are offered a position, we may also collect details such as your tax file number, bank account number, superannuation and union membership details.

The Privacy Act contains certain exemptions in relation to certain acts undertaken in relation to employee records and related bodies corporate. Where appropriate we make use of relevant exemptions in the Act.

5 HOW WE COLLECT YOUR PERSONAL INFORMATION

5.1 Directly from you

In many instances, we collect personal information directly from you. For example, we may collect information when you:

- register to use or become a member of our sites;
- communicate with us through correspondence, email or through the chat functionality on our sites;
- participate in contests, chat rooms or bulletin boards;
- purchase downloads, send e-cards or post material on our sites;
- subscribe to any services (e.g. newsletters or email updates on particular artists or types of music); and
- otherwise use our sites (this is described in more detail in the next section).

5.2 By using cookies and other technologies

When you access and use our websites, we may use 'cookies', pixels and other tracking technologies to collect data about your use of our websites and other websites that you visit. This data may include IP-addresses, browser version, number of visits and similar such data relating to your navigation of the Internet and our site. A 'cookie' is a small text file that is placed on your computer's hard drive. Cookies and pixels help us to improve our sites and to deliver a better and more personalised service, for instance by storing information about your preferences and allowing us to recognise you when you return to our site. This information does not identify individual users. We use this information to identify usage trends, to administer our sites, to track users' movements around our sites and to gather demographic information about our users collectively. You may refuse to accept cookies and pixels by activating settings on your Internet browser. However, please note that if you select such settings you may be unable to access certain parts of our site.

Our sites may also host cookies and pixels from third party services (such as Google, Facebook, Twitter or Snapchat) for the purposes of collecting data to enable personalised advertising services. For more information on cookies and pixels from third parties, refer to section 8.3 below.

5.3 From third parties

We may also collect information about you from our related bodies corporate, third party service providers and other organisations that we partner with. Some examples are set out below.

- When you apply for a job or position with us, we may collect information about you from any recruitment consultant, your previous employers, referees, CV checking agencies or others who may be able to provide information to assist us with our decision.
- When you use certain features on our sites that connect to your online profiles or social media accounts, we may collect personal information about you from the third parties that help us manage our sites. For example, when you sign in to a feature of one of our sites through a social media account such as Spotify, service providers that help us manage our sites may collect data about your use of the relevant platform and provide it to us so we can provide you with tailored offers and content.

6 HOW WE USE YOUR PERSONAL INFORMATION

6.1 General

We collect, hold, use and disclose your personal information for our business operations and activities, for example:

- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to conduct advertising or marketing, including to provide you with direct marketing communications, information, products or services that you have requested or otherwise consented to receive from us (or third parties, where appropriate) or which, based on your musical preferences or use, we feel may interest you;
- to send you requested updates and newsletters about an artist, type of music or related special offers;
- to send you requested product or service information;
- to administer competitions you enter and to contact you if you win a prize and to send the prize to you;
- to carry out our obligations arising from any contracts entered into between you and us;
- to fulfil your order;
- to send you an order confirmation;
- to respond to your service requests, questions and concerns;
- to administer your account;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to notify you about changes to our service, terms or policies;
- to display or promote content based upon your location and/or interests;
- to conduct research and analysis;
- to comply with our legal obligations, resolve any disputes that we may have, and enforce our agreements with third parties; and
- to process information submitted with a job application.

6.2 Combining information

We may link or combine the information that we collect about you from different sources (including information received from our related bodies corporate about your use of other Sony products and services). Information may be linked via a unique identifier, such as a cookie or account number. Alternatively, we may decide to combine two or more databases into a single database of customer information.

We may do this for your and/or our convenience (for example, to allow you to more easily register for a new service), to allow us to provide a more seamless customer support whenever you contact us and to provide you with better, personalised services, content, marketing and adverts.

7 SITE MONITORING

To help protect you and others, we monitor use of our sites, and we use the information we collect, including personal information, to:

- identify fraudulent activities and transactions;
- prevent abuse of and investigate and/or seek prosecution for any potential threats to or misuse of our sites;
- ensure compliance with and investigate violations of or enforce the Terms and Conditions of the use of our sites and this Privacy Policy; and
- otherwise to protect the rights and property of Sony Music Entertainment, its partners, and customers.

Monitoring may result in the collection, recording, and analysis of online activity or communications through this site. If you do not consent to these conditions, you must discontinue your use of the site.

8 WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with the following, for purposes described in this Privacy Policy:

8.1 Group companies and third party service providers

We may share your personal information with our employees or related bodies corporate worldwide, third party service suppliers and providers, professional advisers, dealers and agents or existing or potential agents, business partners or partners.

8.2 Artists

We may share your personal information with those artists (and their management companies) that you have expressed an interest in, who may then use your personal information, in accordance with this policy, to keep you updated with information about them.

8.3 Third parties that help us manage or interact with our sites

We may share your personal information with third party service providers so that they can deliver certain services to us, such as hosting or managing our sites, sending emails and carrying out data analysis.

Our sites use cookies and pixels from third party services (such as Google, Facebook, Twitter or Snapchat). Our sites also have interactive features that engage with social media services such as Facebook, Twitter and Snapchat. If you use our sites or these features (such as a "like" or "share" button, or you sign up to a competition using your social media account), these third party sites may collect personal information about you to enable personalised marketing services. They may also share the information they collect with us.

Our sites also use Google Analytics to gather statistical information on how users interact with our sites. Google Analytics uses cookies. Although these cookies do not identify you personally, they allow information about your use of our sites (including your IP address and device ID) to be transmitted to Google. For more information, please see Google's site "How Google uses data when you use our partners' sites or apps", located at <https://policies.google.com/technologies/partner-sites>. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

8.4 Other third parties

Where you take part in a promotion (such as a competition, prize draw or contest) that we hold in conjunction with another company, we may share your personal information with that company. This may also mean that your personal information will be included in a winners' list.

We may transfer, sell or assign any information, including personal information, to third parties, in connection with the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of Sony Music Entertainment, or any part of it.

We may share with others, at our discretion, certain aggregate statistical data about purchases and the use of our content, which data may include demographic data such as the age range and/or geographic location of groups of users. No personal information (such as names or email addresses) will be identifiable from such statistics.

8.5 Persons required by law

We may otherwise disclose personal information to any person as required, authorised or permitted by law. For example, there may be times when we have to disclose your information to a law enforcement agency.

9 OVERSEAS DISCLOSURE

We may disclose personal information outside of Australia, including to third party service providers and related bodies corporate located in the United Kingdom, the United States of America and Singapore. We will take reasonable steps to ensure that any person located outside of Australia to whom we disclose your personal information will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

10 SECURITY

We generally hold personal information in our electronic databases but also store personal information in hard copy form and in various third party databases and platforms.

Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access. However, the transmission of information via the Internet is not completely secure and we cannot guarantee that any information you submit to us will be free from unauthorised third party intrusion. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

We have taken precautions to ensure that any credit card payments via our websites are safe and secure. We store your credit card details after your first purchase so you don't need to continually enter and transmit those details over the internet. To protect your personal information and privacy, we automatically encrypt your credit card data using Secure Sockets Layer (SSL). SSL encrypts all of your personal information, including credit card number, name, and address, so that it cannot be read as the information travels over the Internet.

You will know when transmitted data is safe by the appearance of a security notice when you enter a secure page. Usually, a secure icon will appear on your browser. Secure web pages can also be identified by their URL: they begin with 'https://', while standard pages begin with 'http://'.

We have also implemented measures to ensure that your stored credit card details are kept safe.

11 YOUR RIGHT TO OBTAIN, CHANGE OR REMOVE YOUR PERSONAL INFORMATION

You can opt out of receiving any further messages from us or anyone with whom we share your personal information (as described above) at any time by following the unsubscribe instructions in any message sent to you.

You have a right to access most of the personal information we hold about you, and also the ability to correct or update it. Please contact our Privacy Officer (see below) to submit your enquiries for access to, or correction or update of, the personal information we hold about you. We may deny your request in some circumstances, but if we do this we will tell you why.

12 OTHER WEBSITES

Our websites may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect and process personal information from you in a way which is different to how we do so.

13 CHANGES TO OUR PRIVACY POLICY

We may modify, alter or otherwise update this Privacy Policy at any time. We will indicate any changes by updating the date at the top of the policy. We encourage you to review this policy from time to time. If you have any questions about this policy, please contact our Privacy Officer (see below).

14 COMPLAINTS

If you believe that we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, we encourage you to contact us using the details at the end of this Privacy Policy.

Please include your name, email address and/or telephone number and clearly describe your complaint. We will respond within a reasonable period of receiving your complaint.

If you are dissatisfied with the handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). For further information regarding how to make a complaint to the OAIC, you can visit <https://www.oaic.gov.au/privacy/privacy-complaints>.

15 HOW TO CONTACT US

You may contact our Privacy Officer by sending an email to enquiries.au@sonymusic.com or by writing to The Privacy Officer, Sony Music Entertainment Australia Pty Limited, 11-19 Hargrave Street, East Sydney, NSW 2010.